

10 APR 1989

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL DIVISION  
2151 BERKELEY WAY, ANNEX 7  
BERKELEY, CA 94704



## LAND BAN GENERATOR INSPECTION REPORT

EPA ID#: CAT080014079

Facility Name: Bay Area Environmental

Facility Location: 1125 Hensley Street  
Richmond, CA 94804Inspected By: James McCammon  
Ray Balcom

Date of Inspection: 2/24/89

Background: This inspection was conducted as part of the Department's RCRA grant workplan commitment, and was intended to assess the facility's compliance with the federal requirements contained in 40 CFR Part 268.

Persons Present: Thomas M. Meichtry  
David Burton

Sr. HMS/Sr. WME

Patricia Brown

Date of Report

3/29/89

*Bay Area Environmental* Land Disposal Restrictions  
(Part 268)

2/24/89

EPA I.D. CAT 080014079

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listings)			
F001 thru F005 spent solvents?	✓		F1-5
F020-23 and F026-28 Dioxins?	✓		4 drum dioxin suspect
"California List" wastes?	✓		
First Third scheduled wastes?	✓		

Exemptions: Are the prohibited wastes exempted from land disposal restrictions because:

The waste is from conditionally-exempt small quantity generators? 268.1(c)(3)(all)	✓		
A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(c)(4)		✓	
An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d)		✓	

If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

Exceptions: Can the restricted wastes continue to be land disposed because:

A case-by case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1)(all), 268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins), 268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)			N/A
A no-migration petition has been granted under 268.6, for the wastes and units involved? (See 40 CFR 268.6(e-f) for operating requirements.) 268.1(c)(2)(all), 268.30(d)(2)(F001-5), 268.31(d)(2)(dioxins), 268.32(g)(1)(CA list), 268.33(e)(2)(1st 3rd)			N/A

An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a)

✓ — cyanide wastes treated at Chem-waste - Esmeralda

\* Land disposal means placement in or on the land, including a landfill, surface impoundment waste pile, land treatment facility, salt dome formation, underground mine or cave, injection well, or placement in a concrete vault or bunker for disposal. 268.2(a) Injection wells are being covered under a separate schedule.

Land Disposal Restrictions - Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
<u>Generators: Waste Analysis</u>			
If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)	<u>  </u>	<u>  </u>	N/A Does not generate
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i)	<u>  </u>	<u>  </u>	waste - transfer and storage only
Did the generator determine if liquid CA list wastes have a pH of less than or equal to 2? 268.32(j)(1)	<u>  </u>	<u>  </u>	
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)	<u>  </u>	<u>  </u>	
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	<u>  </u>	<u>  </u>	
<u>Notices, Certifications, and Demonstrations:</u>			
If determined that the waste is <u>restricted and requires treatment</u> before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-	<u>X</u>	<u>  </u>	
(i) EPA H.W. number?	<u>X</u>	<u>  </u>	
(ii) Appropriate treatment standards and prohibitions?	<u>X</u>	<u>  </u>	
(iii) Manifest # for the waste?	<u>X</u>	<u>  </u>	
(iv) Available waste analysis data?	<u>X</u>	<u>  </u>	
If the waste is determined to be <u>restricted but not require further treatment</u> , has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)	<u>X</u>	<u>  </u>	
Did the notification include: 268.7(a)(2)(i)-			
(A) EPA H.W. number?	<u>X</u>	<u>  </u>	
(B) Appropriate treatment standards and prohibitions?	<u>X</u>	<u>  </u>	
(C) Manifest # for the waste?	<u>X</u>	<u>  </u>	
(D) Available waste analysis data?	<u>X</u>	<u>  </u>	

Land Disposal Restrictions - Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Generators of First Third "soft hammer" wastes (268.33(f)) shipped for land disposal:			
Prior to shipment for land disposal, has the generator certified and submitted to the R.A. a demonstration of a good faith effort to locate and contract with treatment and recovery facilities for the practically available treatment which provides the greatest environmental benefit?			
268.8(a)(1-2)	<u>X</u>	___	_____
Did the demonstration include a list of facilities and representatives contacted, complete with addresses, phone numbers, and contact dates? 268.8(a)(2)			
	<u>X</u>	___	_____
Was a copy of the demonstration submitted to the receiving facility with the first shipment of waste, and the certification with each shipment of waste?			
268.8(a)(3) or -(4)	<u>X</u>	___	_____
Are copies of the demonstration and certification kept on site for at least five years? 268.8(a)(3) or -(4)			
	<u>X</u>	___	_____
If the generator determined there is <u>no</u> practical treatment for his waste, did the demonstration include a written discussion and the following certification?			
268.8(a)(2)(i)	<u>X</u>	___	<u>See attached letter</u>
<p>I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.</p>			
If the generator determines that there <u>are</u> practical treatments for the waste, did they contract to use the technology that they demonstrated yields the greatest environmental benefits? 268.8(a)(2)(ii)			
	<u>X</u>	___	_____
Did they include the following certification? 268.8(a)(2)(ii)			
	<u>X</u>	___	<u>See attached letter</u>
<p>I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology that yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.</p>			



Land Disposal Restrictions - Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
<u>Treatment Facilities: Waste Analysis</u>			
Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)	<u>X</u>	<u>  </u>	<u>  </u>
Where treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards? 268.7(b)(1)	<u>  </u>	<u>  </u>	<u>N/A</u>
For CA list-only wastes, were the applicable 268.32 Paint Filter Liquids Test, pH test, HOCs, and PCB tests performed? 268.7(b)(2)	<u>  </u>	<u>  </u>	<u>  </u>
For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested? 268.7(b)(3)	<u>  </u>	<u>  </u>	<u>  </u>
<u>Notifications and certifications:</u>			
Has the treater submitted with each shipment to the land disposal facility, a notice including: 268.7(b)(4)	<u>  </u>	<u>  </u>	<u>  </u>
(i) EPA H.W. number?	<u>  </u>	<u>  </u>	<u>  </u>
(ii) Corresponding treatment standard?	<u>  </u>	<u>  </u>	<u>  </u>
(iii) Manifest # for the waste?	<u>  </u>	<u>  </u>	<u>  </u>
(iv) Available waste analysis data?	<u>  </u>	<u>  </u>	<u>  </u>
Has the treatment facility submitted a signed certification with each shipment of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)	<u>  </u>	<u>  </u>	<u>  </u>
For wastes with treatment standards listed as concentrations (268.41 or .43) did the certification read: 268.7(b)(5)(i)	<u>  </u>	<u>  </u>	<u>  </u>

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR Part 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Land Disposal Restrictions - Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Treatment in surface impoundments exemption:			
If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility met the following conditions: 268.4(a)			
(1) Treated, not just stored, the wastes in the impoundment?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
(2)(i) Analyzed all treatment residues (sludge and supernatant separately) to determine if they meet treatment and/or prohibition standards?	<input type="checkbox"/>	<input type="checkbox"/>	
(2)(ii) Removed annually all treatment residues (including liquids) that do not meet treatment or prohibition standards?*	<input type="checkbox"/>	<input type="checkbox"/>	
(2)(iii) Not placed the residues in another impoundment for subsequent management?*	<input type="checkbox"/>	<input type="checkbox"/>	
Has the facility certified that all impoundments used to treat restricted wastes meet design requirements (265.221(a)) and that the facility is in compliance with GW monitoring (265 Subpart F) requirements? 268.4(a)(3-4)	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a principal means of treatment other than evaporation of H.W. constituents? 268.4(b)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the waste analysis plan include the procedures and schedule for: 268.4(a)(2)(iv); 265.13(b)(7)-			
(i) Sampling the impoundment contents?	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) The analysis of test data?	<input type="checkbox"/>	<input type="checkbox"/>	
(iii) The annual removal of residues which exhibit a H.W. characteristic, and:			
(A) Fail 268 Subpart D treatment standards? or:	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Where no treatment standards have been established, such residues are prohibited from land disposal under:			
(1) 268.32 (CA list) or RCRA 3004(d)?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) 268.33(f) (1st 3rd)?	<input type="checkbox"/>	<input type="checkbox"/>	

\* Unless the wastes have a valid "good faith" certification under 268.8. If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed.

Land Disposal Restrictions - Continued  
(Part 268)

Identified TSFs that treat LDR Waste:

AZD049318009	Buds Oil Service
AZD980816102	Environmental Waste Entpr
AZT050010230	Esco
AZD089308803	Safety Kleen
AZD980892897	Safety Kleen
AZD009015389	Southwest Solvents
AZD049314370	Rinchem Co Inc
CAT080010101	Appropriate Technologies
CAD074644659	Baron Blakeslee
CAT000618652	Baron-Blakeslee
CAT080014079	Bay Area Environmental
CAD028409019	Crosby & Overton
CAD000633115	IT Corp, San Jose Transfer
CAD008302903	Oil & Solvent Processing
CAD042245001	Omega Chemical
CAD029363876	Orange County Chemical Co
CAT080012651	Orange County Chemical Co
CAD095894556	Pacific Treatment Company
CAD008364432	Rho-Chem
CAD980737548	Roehl Corp
CAD009452657	Romic Chemical
CAD066113465	Safety Kleen
CAD077187888	Safety Kleen
CAD093459485	Safety Kleen
CAD980894562	Safety Kleen
CAT000613935	Safety Kleen
CAT000613919	Safety Kleen
CAD066177783	Safety Kleen
CAT000613893	Safety Kleen
CAT000613976	Safety Kleen
CAT000613992	Safety Kleen
CAT000613950	Safety Kleen
CAT000613927	Safety Kleen
CAD080916968	Safety Kleen
CAD980892475	Safety Kleen
CAT000613984	Safety Kleen
CAD053044053	Safety Kleen
CAD980817159	Safety Kleen
CAT000613943	Safety Kleen
CAT000613968	Safety Kleen
CAD059494310	Solvent Services
CAT080033681	Chem Tech Inc. (formerly Triple J Pacification)
NVD980895338	Eticam

ID#

Name/Address

Accepted w/o  
Certification?

Land Disposal Restrictions - Continued  
(Part 268)

Identified TSFs that treat LDR Waste:

AZD049318009	Buds Oil Service
AZD980816102	Environmental Waste Entpr
AZT050010230	Esco
AZD089308803	Safety Kleen
AZD980892897	Safety Kleen
AZD009015389	Southwest Solvents
AZD049314370	Rinchem Co Inc
CAT080010101	Appropriate Technologies
CAD074644659	Baron Blakeslee
CAT000618652	Baron-Blakeslee
CAT080014079	Bay Area Environmental
CAD028409019	Crosby & Overton
CAD000633115	IT Corp, San Jose Transfer
CAD008302903	Oil & Solvent Processing
CAD042245001	Omega Chemical
CAD029363876	Orange County Chemical Co
CAT080012651	Orange County Chemical Co
CAD095894556	Pacific Treatment Company
CAD008364432	Rho-Chem
CAD980737548	Roehl Corp
CAD009452657	Romic Chemical
CAD066113465	Safety Kleen
CAD077187888	Safety Kleen
CAD093459485	Safety Kleen
CAD980894562	Safety Kleen
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CAD980817159	Safety Kleen
CAT000613943	Safety Kleen
CAT000613968	Safety Kleen
CAD059494310	Solvent Services
CAT080033681	Chem Tech Inc. (formerly Triple J Pacification)
NVD980895338	Eticam

ID#

Name/Address

Accepted w/o  
Certification?



HAZARDOUS WASTE  
INSPECTION REPORT



DATE of INSPECTION 11 May 1988

FIRM NAME Bay Area Environmental SITE CLASSIFICATION RCRA ☒ Non RCRA ☐  
ADDRESS 1125 Hensley Street Major ☐ Non Major ☒  
Richmond, CA 94804 EPA I.D. NUMBER CAT 080014079  
INSPECTOR James McCammon *JMC*, HMS/WME/AHMS 20 May 1988  
Date of Submittal

PURPOSE:

Annual inspection of a non-major permitted facility, generator inspection, and land-ban inspection.

PERSONS PRESENT:

Thomas Meichtry, Director, Bay Area Environmental  
Quintin Young, Facility Manager, Bay Area Environmental  
David Burton, Facility Manager, Bay Area Environmental  
Martita Jeung, Permit Unit, DHS, TSCD  
James McCammon, Surveillance & Enforcement, DHS, TSCD

OWNER/OPERATOR:

Bay Area Environmental, Inc. is a California Corporation. J. Jesus Magana, of the above address, is the Chief Executive Officer and Secretary; Robert Sisneros is the chief financial officer. (Attachment 1) Thomas Meichtry stated that Jesus Magana owns over 90% of the stock in the company.

BACKGROUND:

Bay Area Environmental, Inc. (BAE) was issued a Hazardous Waste Facility Permit, to act as a transfer station and to store hazardous wastes in drums on August 2, 1983. The Department of Health Services (the Department) inspected the facility on the following dates:

July 7, 1984; no violations.

June 26, 1985 three Class II violations.

August 12, 1987; several Class I violations:  
Storage of many more drums than allowed by Permit; drums stored in wrong bays, incompatibles together; No aisle space; and several records violations.

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The violations found in 1985 have been corrected; of the violations found in 1987, the aisle space violation and most of the records violations have been corrected. The remaining violations still exist, but the extent and severity have been greatly reduced.

On 20 July 1987, Rollins Environmental operating at BAE pumped a mixture of acids contaminated with metals from drums into four 300 gallon plastic containers. That evening, the chemicals reacted, burst three of the containers, released gas, and spilled hazardous waste on the soil. As a result, several additional violations have been alleged:

- o allowing persons who have not received approved training to work without supervision,
- o mixing incompatible wastes,
- o failure to submit a written incident report within five days,
- o storing wastes outside bermed area.

DESCRIPTION OF FACILITY:

BAE occupies an approximately one acre site in an industrial area of northwestern Richmond. It has been in existence as a transfer station since 1983. There are two separate structures on the site: one, a building containing the offices, laboratories, and shop, to which is attached an open fronted shed which contains the flammables and the oxidizers storage bays; and a separate open fronted shed which contains the acids, the oil and pesticides, and the caustics storage bays. Attachment 3 has maps of the facility.

HAZARDOUS WASTE ACTIVITIES:

BAE is a transfer station that receives and stores hazardous waste in drums. Wastes in smaller containers such as home owners' wastes, are repackaged into drums. The drum storage capacity is set in Part IV 2(c)(5) of the Permit to be:

"acid, toxic, oxidizer - 84 drums each,  
caustic - 105 drums,  
flammable - 53 drums."

BAE has received a letter (Attachment 2) from the Department approving the transfer of wastes between containers and from containers into trucks at BAE.

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VIOLATIONS:

1. Section 25190, California Health and Safety Code (H&SC); Section 66374 (a), Title 22, California Code of Regulations (22 CCR); Part IV 2(e) Hazardous Waste Facility Permit (Permit):

There were more drums than the Permit allows in the flammables bay. The Permit states that the flammables area "shall contain no more than" 53 drums. At the time of the inspection there were approximately 84 drums in the flammable bays. This number was computed by counting the drums in groups of four (the number of drums per pallet) and multiplying by four. One or two pallets may have held only three drums, but there were one or two small drums on top of the others (photos 3 and 4).

Thomas Meichtry said that BAE had increased the containment capacity of the flammables bay and had notified the Department of the increase by letter (Attachment 3). He said BAE had received no reply to the notification.

2. Section 25190, H&SC; Section 66374(a), 22 CCR; Part III 2 (e) Permit; Part V A, Operation Plan (Plan):

BAE was handling a waste listed as prohibited in the Permit. At the time of the inspection there was a drum labeled PCB in the acid storage bay (photos 1 and 2). (See copy of manifest and copy of list contents, Attachment 4). When M. Jeung and I pointed the drum out, David Burton said it had come in the previous day and that BAE would reject it and return it to Lockheed.

3. Section 67247(e), 22 CCR; Part IV 2(b)(2) and III 12(d). Permit; Section VIII, plan:

Incompatible wastes were not separated: a lab packed drum labeled 'flammable' was in the 'oxidizer' storage area and two drums labelled waste oil were in the 'acids' storage area.

4. Sections 66515(a)(b)(1) and (3), 66480, 66481, 66482, 22 CCR; Part VIII (page 12) and Part XII (page 41) Plan:

BAE shipped hazardous waste off-site and out of the country without a manifest and without notifying either the Administrator of the EPA or the Department.

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On April 25, 1988, BAE shipped 72 drums of spent catalyst to Falconbridge, Limited, a nickel, copper and cobalt smelter in Ontario, Canada. In a phone conversation on 13 May 1988, Mr. Randy Jaggard of Industrial By-product Recycling Inc., the originators of the waste, stated the spent catalyst contained five to sixteen percent nickel (Attachments 9 and 10). The load was shipped under bill of lading, not a uniform hazardous waste manifest (Attachment 5).

Thomas Meichtry stated that they had thought that because this waste was being returned to the original producer, it did not require a manifest.

Mr. Bob Gutauskas at Falconbridge Limited stated, in a phone conversation on 13 May, 1988, that his firm will produce pure metal from the spent catalyst, and it does not manufacture catalysts (Attachment 9).

David Burton stated that BAE had not notified the EPA or the Department in advance of the shipment of the wastes out of the country.

5. Section 66508(a) and (c)(1), 22 CCR:

One drum of hazardous waste was incompletely labeled. The drum marked 'flammable' in the oxidizer storage bay had a label on which the composition and physical state of the waste was not recorded. I removed the lid of the drum and observed that the drum contained glass bottles and absorbent and was about half full. Several drums lacked both accumulation dates and acceptance dates on the hazardous waste labels.

6. Section 67243(a), 22 CCR; Part IV 2(c)(2) Permit; Part VIII (page 15) Plan:

A drum of hazardous waste was not stored closed. One drum, labeled 'flammable poison' in the flammable storage area, had its plug resting loosely in the bung hole. Martita Jeung removed the plug, and David Burton replaced it and screwed it down. He said the drum contained mixed solvents that could not be recycled (photo 5).

7. Section 67104(d), 22 CCR:

The inspection logs for the hazardous waste facility do not contain any notation of the date and nature of any repairs or other remedial actions. I inspected the logs, and in no case was there any notation of remedial action made when a problem or deficiency was noted.



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8. Section 67141(d), 22 CCR:

BAE Contingency Plan does not contain the addresses of the emergency coordinators. I inspected the revised (2/01/88) Contingency Plan (Attachment 6) provided me by Thomas Meichtry. The emergency coordinators are listed on the second page, and on the seventh page, but their home addresses are not listed anywhere in the plan.

OTHER OBSERVATIONS:

BAE has not yet submitted its Biennial Report. David Burton sent a letter (Attachment 11) requesting an extension. Attachment 12 is the Department's response, granting the extension.

Thomas Meichtry said that BAE had four drums that contained waste water contaminated with 2-4-D that they had received as a result of a fire at Chevron Chemical facility. He said they have had the drums longer than a year and there is no place to dispose of them. He stated they were covered by a two year blanket storage variance from the EPA for dioxin containing wastes.

BAE has established a computer tracking system for the drums of waste they handle. Quintin Young stated that BAE plans to establish a bar code system for labeling their drums.

BAE has sent some of their personnel to a 40 hour training program given by Ridel Environmental to supplement the eight hour training given in-house.

BAE now has a certified laboratory at the facility to do their waste analyses.

DISCUSSION WITH MANAGEMENT:

Thomas Meichtry said that BAE plans to ask for a Permit to treat wastes when they renew their Permit this year. They would like to do neutralization, stabilization, and solidification. He said they had filed an application with the City of Richmond for an industrial sewage connection.

I asked Thomas Meichtry about BAE's understanding of the waste limitation listed in Part V A of the Operations Plan. He stated that Part V A was "open to interpretation", that the second and third sentences implied an intention to accept a far greater range than the limits stated in the first sentence.

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SAMPLES:

None

PHOTOGRAPHS:

1 and 2	PCB drum in storage,
3 and 4	Flammables bay.
5	Drum with loose bung.

ATTACHMENTS:

1. Copy of corporate statement, BAE, one page.
2. Letter, Will Bruhns to BAE, 14 November 1984, one page.
3. Letter, Dave Burton to Michael James 1 Feb. 1988, three pages.
4. Manifest #87487661 and attached sheet, two pages.
5. Bill of Lading, Industrial By-product Recycling Inc., two pages.
6. BAE Contingency Plan revised 2/01/88 37 pages.
7. Generator Checklist, 15 pages.
8. Land-ban Checklist, 6 pages.
9. Record of Communication, 13 May 1988, one page.
10. Letter, Randy Jaggard to James McCammon, 23 May 1988, two pages.
11. Letter, David Burton to TSCD, 1 May 1988, one page.
12. Letter, David Leu to David Burton, 24 May 1988, one page.

## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY  
BERKELEY, CA 94704  
(415) 540-2043

November 14, 1984


Bill Wahbeh, P.E., President  
Bay Area Environmental  
P.O. Box 579  
San Pablo, CA 94806

Dear Mr. Wahbeh:

This is in response to your letter of November 5, 1984 concerning transfer of wastes between containers and from containers into trucks. These operational changes are considered minor modifications of your Operation Plan and are hereby approved and incorporated into the Operation Plan. All operations shall be conducted in accordance with your facility permit.

If you have any questions, please call Wil Bruhns at (415) 540-2043.

Sincerely,

  
Dwight Hoenig, Chief  
North Coast California Section  
Toxic Substances Control Division

WB:ay

STATE OF CALIFORNIA  
DEPARTMENT OF HEALTH SERVICES

# HAZARDOUS WASTE TESTING LABORATORY CERTIFICATE

is hereby granted to

BAY AREA ENVIRONMENTAL, INC.

to conduct analysis of hazardous waste in the following test categories:

As specified in the Hazardous Waste Testing Laboratory Certification List

This Certificate is granted in accordance with provisions of Article 8.5,  
Chapter 6.5, Division 20 of the Health and Safety Code.

DOCUMENT SOURCE	
DOHS	FWOCH
OTHER <input checked="" type="checkbox"/>	DATE

LABORATORY

Certificate No. 221  
Expiration Date 01-06-90



Issued at Berkeley, on January 8, 1988

by R. Stephen  
Chief, Hazardous Materials Laboratory Section



**BAY AREA ENVIRONMENTAL INC.**  
WASTE MANAGEMENT SERVICES



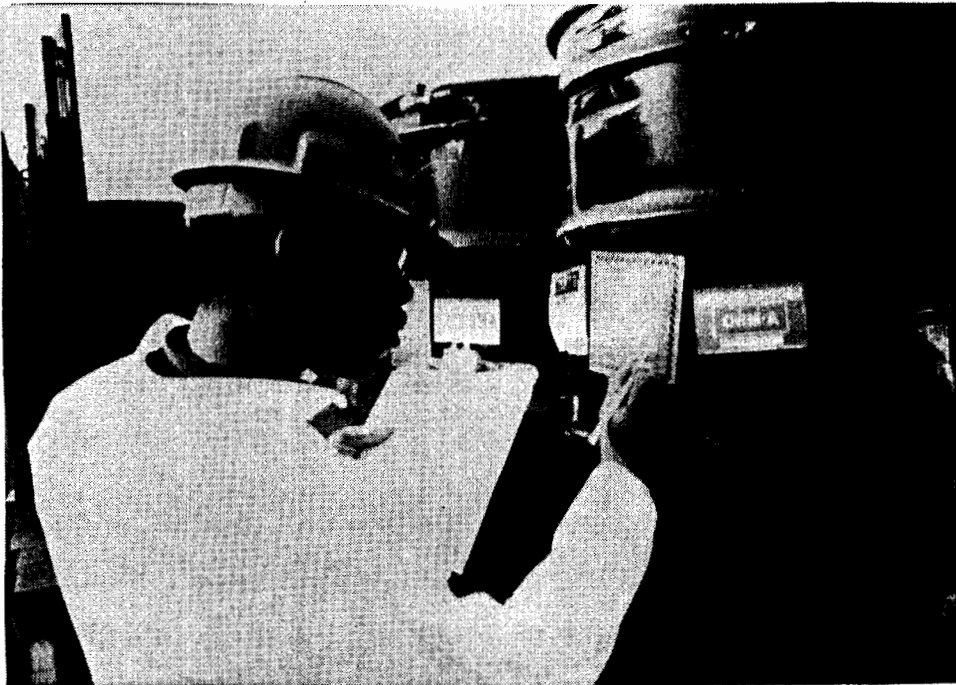
**BAY AREA ENVIRONMENTAL  
1125 HENSLEY STREET  
RICHMOND**



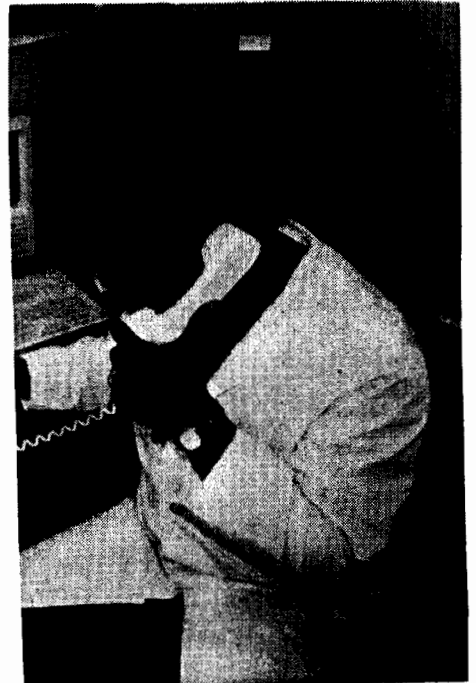
**ENTRANCE - DISPLAYING SIGNS  
- HAZARDOUS WASTE WARNING  
- HOUSEHOLD RECEIVING POLICY**



**BAY AREA ENVIRONMENTAL, INC.**  
WASTE MANAGEMENT SERVICES



**DOCUMENTATION**



**TECHNICAL ASSISTANCE**



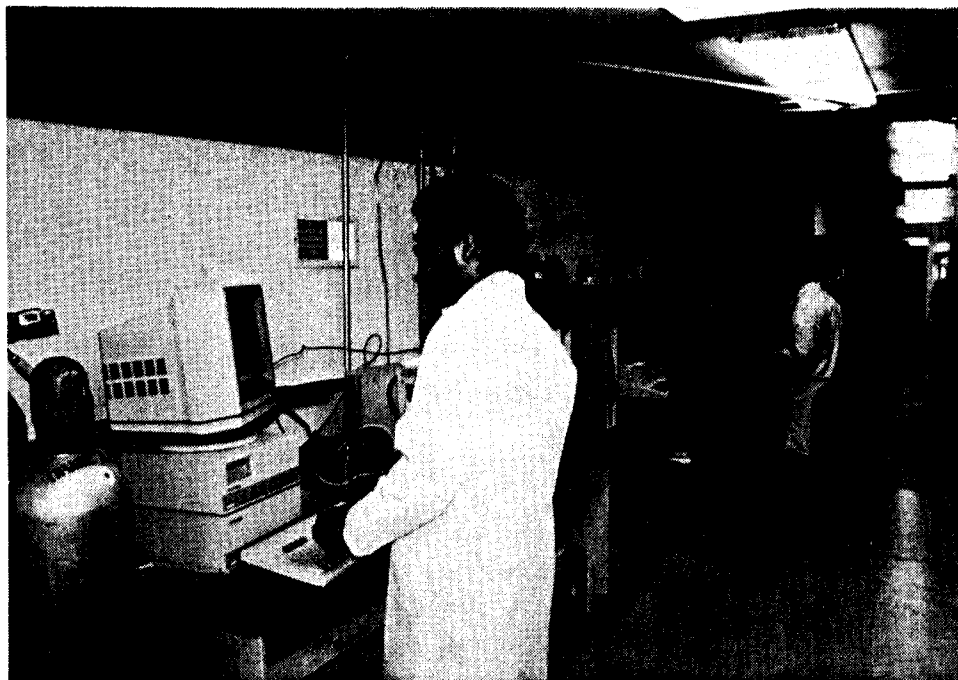
**PROPER PACKAGING FOR DISPOSAL**



**FIELD SERVICES**



**BAY AREA ENVIRONMENTAL, INC.**  
WASTE MANAGEMENT SERVICES



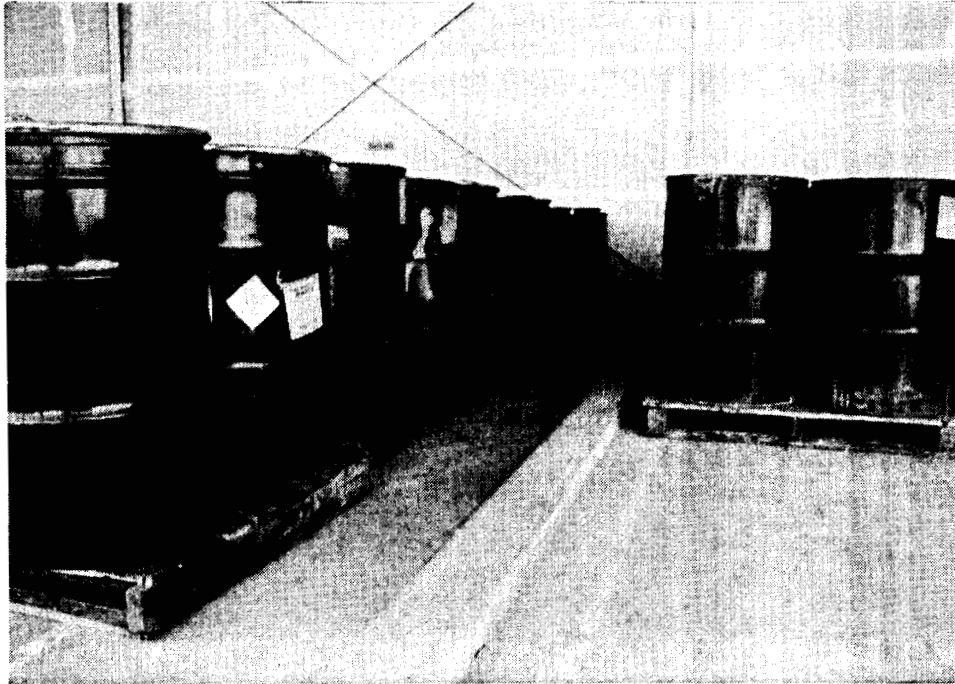
**HAZARDOUS WASTE LABORATORY  
GC AND GC/MS INSTRUMENTS**



**GC/MS INSTRUMENTS FOR  
HYDROCARBON ANALYSIS**



**BAY AREA ENVIRONMENTAL, INC.**  
WASTE MANAGEMENT SERVICES



**WASTE SEGREGATION BERM. FLOOR  
SLOPES TO THE REAR FOR  
CONTAINMENT OF POSSIBLE SPILLS.**

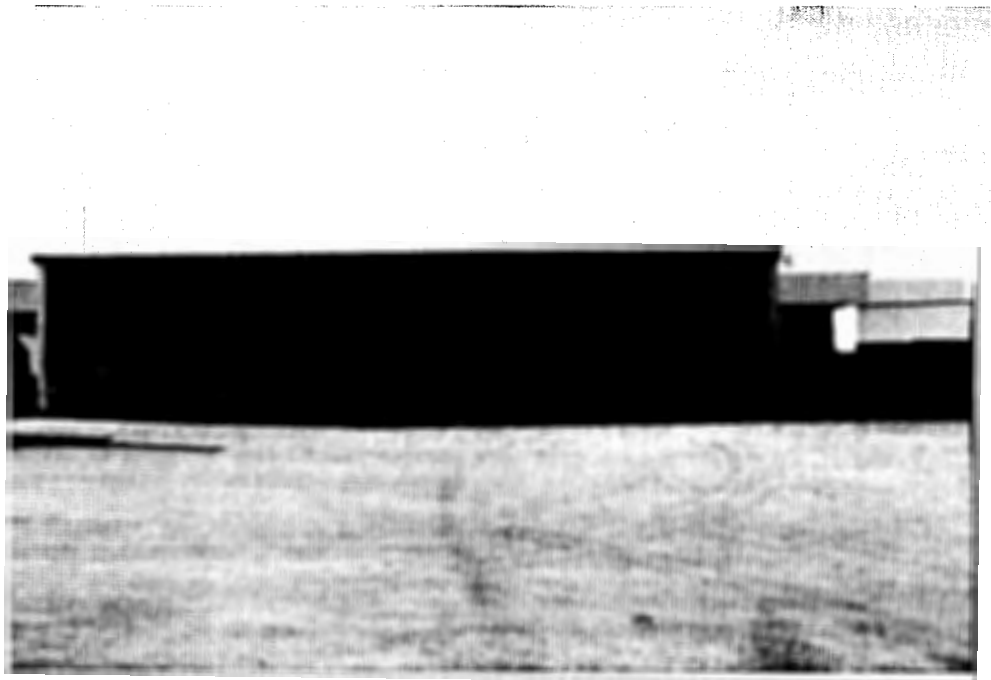


**STORAGE ON PALLETS PREVENTS  
DRUM CONTACT WITH MATERIAL  
IF A SPILL OCCURS.**

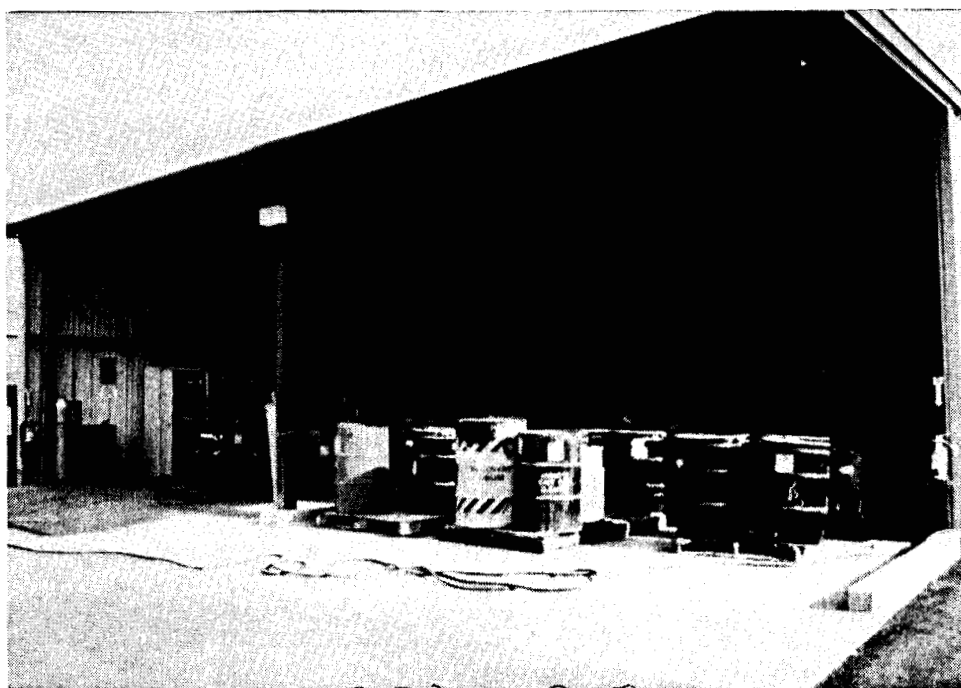




**BAY AREA ENVIRONMENTAL, INC.**  
WASTE MANAGEMENT SERVICES



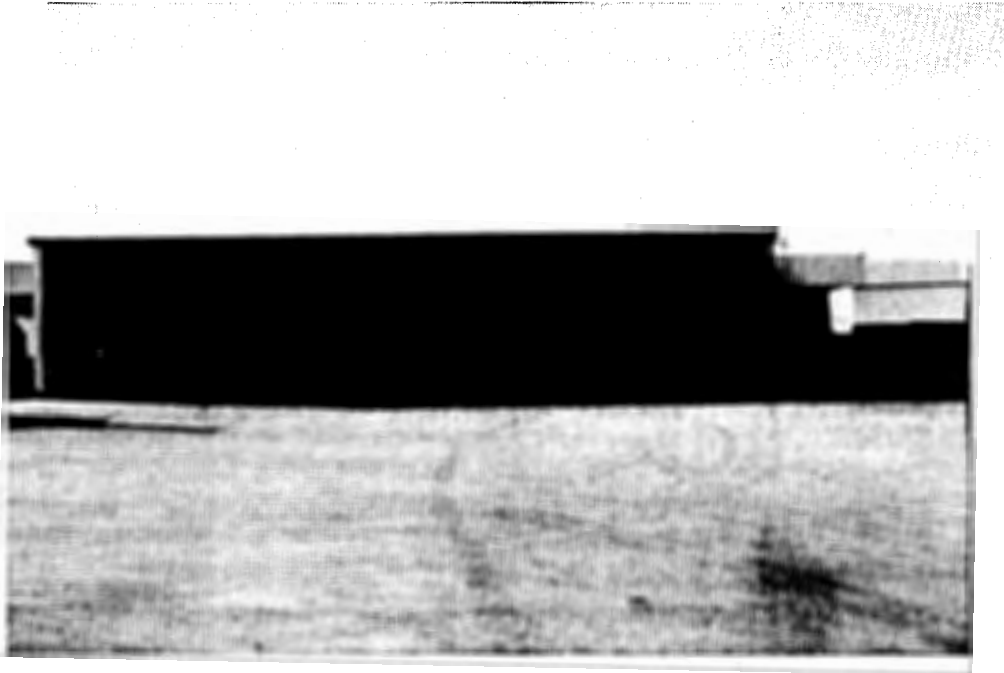
**STORAGE BUILDING FOR ACIDS,  
PESTICIDE AND CAUSTIC WASTES**



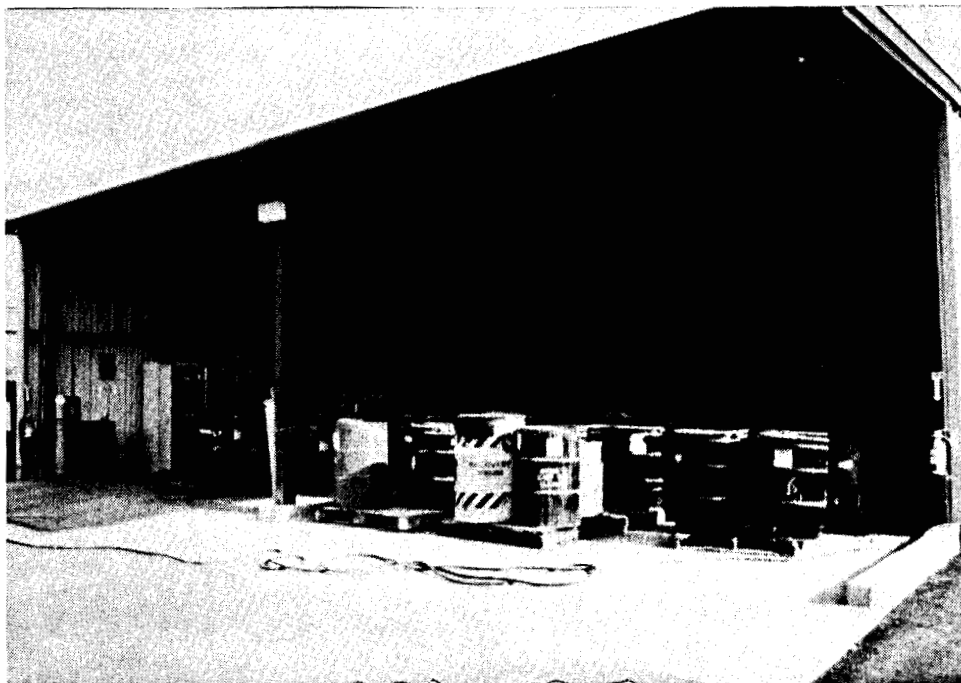
**STORAGE BUILDING FOR OXIDIZER  
AND FLAMMABLE WASTES**



**BAY AREA ENVIRONMENTAL, INC.**  
WASTE MANAGEMENT SERVICES



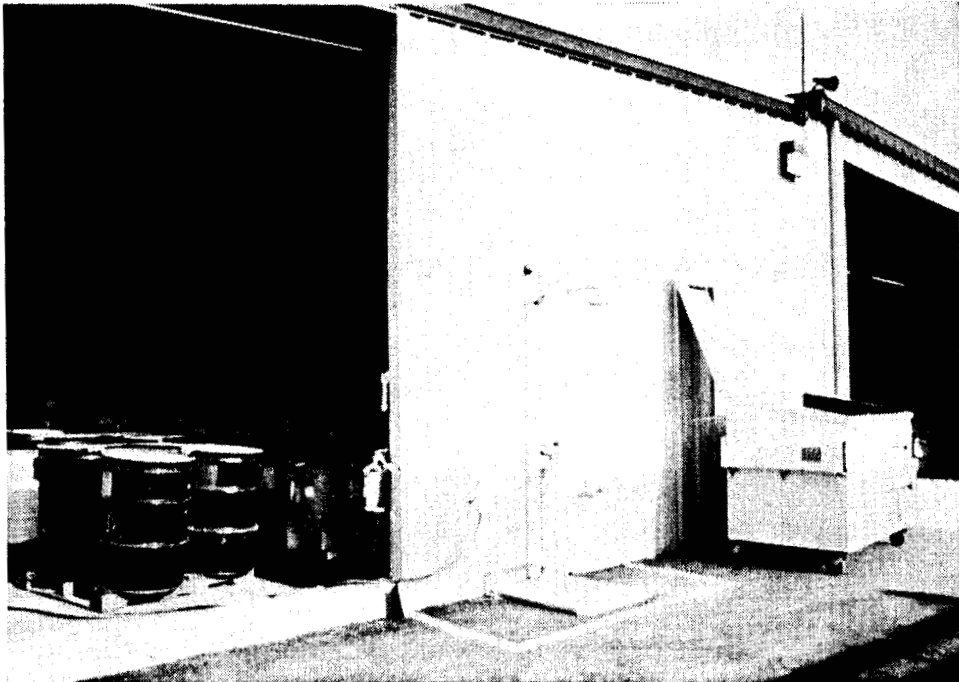
**STORAGE BUILDING FOR ACIDS,  
PESTICIDE AND CAUSTIC WASTES**



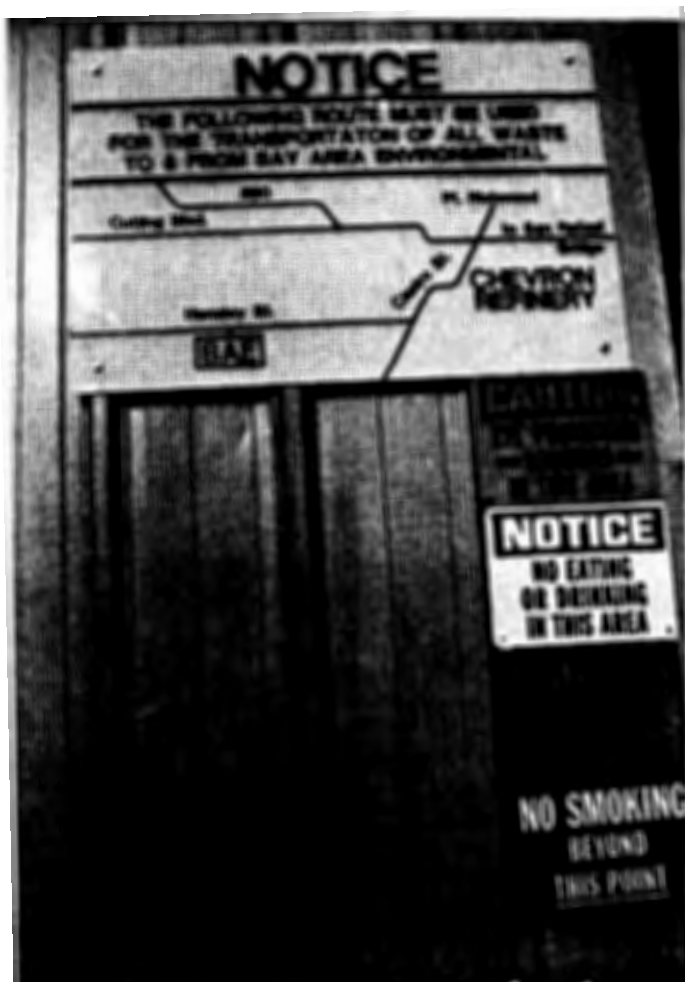
**STORAGE BUILDING FOR OXIDIZER  
AND FLAMMABLE WASTES**



**BAY AREA ENVIRONMENTAL, INC.**  
WASTE MANAGEMENT SERVICES



**EYE WASH AND SAFETY SHOWER.  
THERE IS ONE BESIDE  
EACH BUILDING.**



**WARNING SIGNS IN THE FACILITY  
AND LAB REMIND  
WORKERS OF THE REQUIRED  
SAFETY PRECAUTIONS**



**BAY AREA ENVIRONMENTAL, INC.**  
WASTE MANAGEMENT SERVICES



**DAILY INSPECTIONS INCLUDE A  
CHECK OF SAFETY AND  
EMERGENCY EQUIPMENT LOCATED  
IN EACH BUILDING**



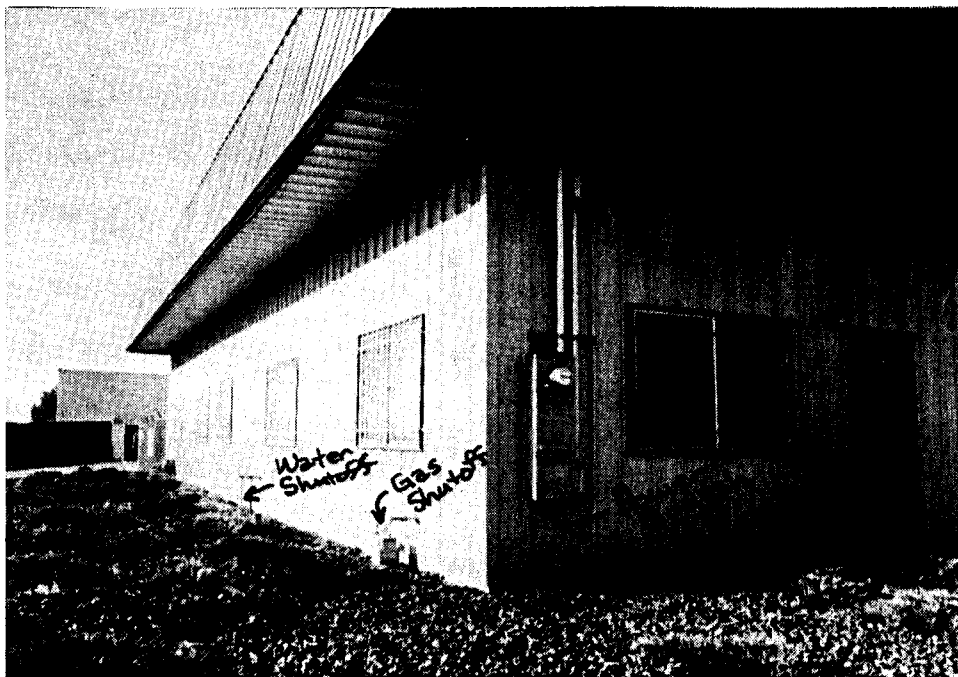
**EQUIPMENT LOCKER, FIRE  
EXTINGUISHER, AND BREATHING  
AIR CYLINDER IN THE ACIDS  
STORAGE AREA**



BAY AREA ENVIRONMENTAL, INC.  
WASTE MANAGEMENT SERVICES



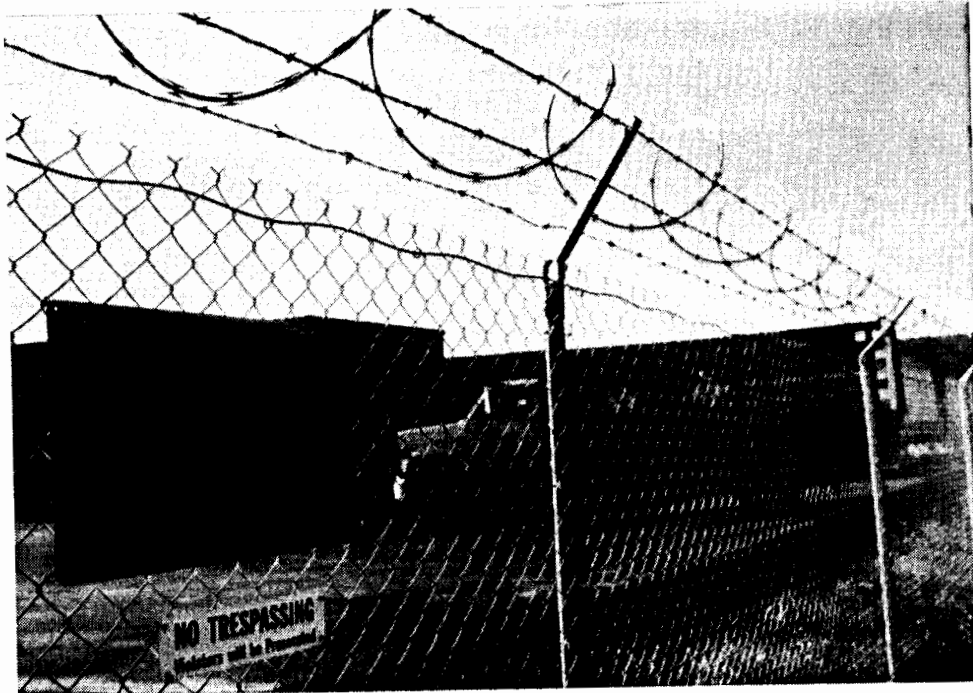
ONE OF TWO SIGNS INDICATING THE  
REQUIRED TRANSPORTATION  
ROUTE FOR HAZARDOUS  
WASTE SHIPMENTS



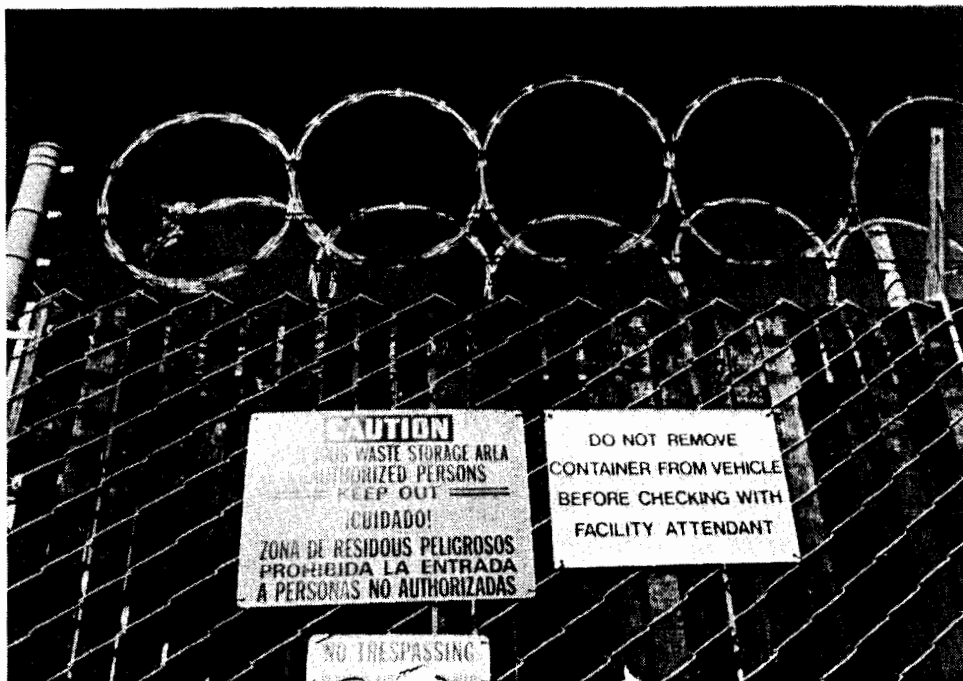
LOCATION OF POWER, GAS AND  
WATER SHUTOFFS TO THE FACILITY



BAY AREA ENVIRONMENTAL, INC.  
WASTE MANAGEMENT SERVICES



**SECURITY FENCE WITH HAZARDOUS  
WASTE WARNING SIGN**



**ENTRANCE SIGNS  
- HAZARDOUS WASTE WARNING  
- HOUSEHOLD RECEIVING POLICY**

84E  
BF

Hazardous Waste Inspection Report

Bay Area Environmental  
1125 Hensley Street  
Richmond CA 94804

August 12, 1987  
RCRA non-major  
EPA ID No. CAT 080014079

James McCammon

June 27, 1988

Purpose:

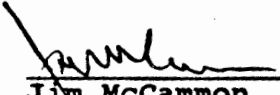
Amendment to inspection report for August 12, 1987.

Violations:

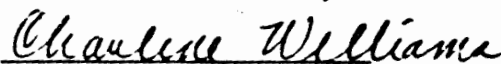
13. Section 67105(a), Title 22, California Code of Regulations, Part III. 11(a) Hazardous Waste Facility Permit.

On or about July 20, 1987, Bay Area Environmental permitted personnel from Rollins Environmental to handle waste at the facility; these personnel had not received the training required in Part IX. A. (page 16) of the approved Operation Plan.

During the inspection on August 12, 1987 David Burton stated that the pumping of the hazardous wastes that reacted and spilled on July 20, 1987 was done entirely by personnel from Rollins Environmental. During a meeting on November 18, 1987 to discuss the causes of the release, Bob Sisneros, General Manager of Bay Area Environmental, stated to James McCammon that Bay Area Environmental's training plan did not include the Rollins Environmental staff who handled the wastes involved in the release on July 20, 1987.

  
Jim McCammon  
Associate Hazardous Materials  
Specialist

June 27, 1988  
Date Submitted

  
Charlene Williams  
Senior Hazardous Materials  
Specialist

June 27, 1988  
Approval Date

**BAY AREA ENVIRONMENTAL, Hazardous Waste Transfer-Storage Facility**

1125 Hensley Street  
Richmond, CA 94804  
Phone (415) 235-9422

Mailing Address:  
P. O. Box 1  
San Pablo, CA 94606

November 5, 1984

Mr. Wil Bruhns  
Toxic Substances Control Division  
North Coast Section  
Department of Health Services  
2151 Berkeley Way  
Berkeley, CA 94704

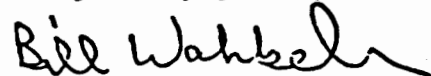
Dear Wil:

To overcome the Department of Health Services ban on the burial of liquid waste containers, Bay Area Environmental found it necessary to add, or remove compatible wastes (within it's designated area) from small containers into 55 gallon drums, or transfer liquid waste from 55 gallon drums into vacuum trucks for disposal or recycling.

This is done in accordance with Bay Area Environmental permit conditions in general and specifically as outlined in Part III, Item 12 (a) and (b), and Part IV, Item 2 (c). Empties are handled as permitted in Part IV, Item (6) of the permit.

If you have any questions concerning the above, or have any objections to it, please let me know.

Very truly yours,



Bill Wahbeh, P.E.  
President

BW/cms

cc: D. Oliva



## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY  
BERKELEY, CA 94704  
(415) 540-2043

November 14, 1984

Bill Wahbeh, P.E., President  
Bay Area Environmental  
P.O. Box 579  
San Pablo, CA 94806

Dear Mr. Wahbeh:

This is in response to your letter of November 5, 1984 concerning transfer of wastes between containers and from containers into trucks. These operational changes are considered minor modifications of your Operation Plan and are hereby approved and incorporated into the Operation Plan. All operations shall be conducted in accordance with your facility permit.

If you have any questions, please call Wil Bruhns at (415) 540-2043.

Sincerely,



Dwight Hoenig, Chief  
North Coast California Section  
Toxic Substances Control Division

WB:ay

## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY  
BERKELEY, CA 94704



## Inspection Report

Bay Area Environmental  
1125 Hensley Street  
Richmond, CA 94804

EPA ID No. CAT080014079

Inspected By: James McCammon  
Raymond Balcom

Date of Inspection: February 24, 1988  
Date of Report: March 24, 1989

I. Purpose:

Comprehensive Enforcement Inspection (CEI) of a non-major RCRA permitted facility, transporter and generator inspection, and land-ban inspection.

II. Persons Present:

Thomas Meichtry, Director, Bay Area Environmental  
David Burton, Facility Manager, Bay Area Environmental  
James McCammon, Associate Hazardous Materials Specialist,  
DHS/TSCD  
Raymond Balcom, Hazardous Materials Specialist, DHS/TSCD

III. Owner/Operator:

Bay Area Environmental, Inc. is a California Corporation. J. Jesus Magana, of the above address, is the Chief Executive Officer and Secretary; Robert Sisneros is the Chief Financial Officer (Attachment 9).

IV. Background:

Bay Area Environmental, Inc. (BAE) was issued a Hazardous Waste Facility Permit, (permit) (#CAT 080014079) to act as a transfer station and to store hazardous wastes in drums on August 2, 1983. The Department of Health Services (the Department) inspected the facility on the following dates:

On July 7, 1984 no violations were observed.

On June 26, 1985 three Class II violations were observed.

On August 12, 1987 several Class I violations were observed:

- o Storage of many more drums than allowed by Permit;
- o drums stored in wrong bays;
- o incompatibles hazardous waste stored together;
- o no aisle space in storage area;
- o several record keeping violations.

On May 11, 1988 four Class I violations were observed:

- o Drum capacity exceeded storage permit;
- o handling prohibited wastes;
- o incompatible hazardous wastes stored together;
- o shipping wastes off-site and out of the country without a manifest and proper notification.

On May 11, 1988 three Class II violations were observed:

- o Incompletely labeled drum;
- o drum stored with loose bung;
- o inspection logs incomplete;
- o contingency plan incomplete.

V. Description of Facility/Waste Stream:

**Facility:** Bay Area Environmental occupies approximately one acre site in an industrial area of north western Richmond. It has been in existence as a transfer station since 1983. There are two structures on the site: one, a building containing the offices, laboratories, and shop, to which is attached an open fronted shed which contains the flammables and the oxidizers storage bays, and a separate open-fronted shed which contains the acids, the oil and pesticides, and the caustics storage bays (Attachment 10 - map of the Facility).

**Waste Streams:** Bay Area Environmental is a Transfer Station with a Hazardous Waste Facility Permit, issued August 2, 1983, to store hazardous wastes in drums. The

facility receives wastes from residences and industry, repackages them into drums or tank trucks as necessary, and stores the wastes in drums in order to consolidate them into full truckloads for disposal or recycling.

Bay Area Environmental does not have any industrial processes that generate waste, except for motor vehicle maintenance. As a transfer station they act as generator for the wastes they have received and stored until the wastes are sent onward for treatment or disposal.

VI. Hazardous Waste Activity Description:

Bay Area Environmental, Inc. is a hazardous waste transfer facility with a Hazardous Waste Facility Permit to store hazardous wastes. They receive a wide variety of wastes from industry and homeowners. The Permit prohibits Bay Area Environmental from receiving the following wastes:

- (a) Extremely hazardous wastes as defined in Sections 66065 and 66685, Title 22, California Administrative Code, unless specifically approved by a written permit from the California State Department of Health Services.
- (b) Wastes in bulk.
- (c) Burning wastes.
- (d) Forbidden and Class A explosives as defined in Section 173.51 and 173.53, Title 49, Code of Federal Regulations.
- (e) Wastes containing polychlorinated biphenyls.
- (f) Greater than five gallons of water-reactive waste at any time.

The drum storage capacity is set in Part IV 2(c)(5) of the Permit to be:

"Acid, toxic, oxidizer - 84 drums each,  
Caustic - 105 drums,  
Flammable - 53 drums."

BAE has received a letter from the Department approving the transfer of wastes between containers and from containers into trucks at BAE.

VII. Violations:

1. Section 66484(g) Title 22, California Code of Regulations:

Bay Area Environmental, Inc. failed to submit to the Department an Exception Report for three Uniform Hazardous Waste Manifests that were not returned by the receiving facility within 45 days of the date the waste was accepted by the initial transporter.

A review of BAE's manifest records and HWMDS indicated the manifests were given to IT Corporation, Martinez on the listed dates. The wastes were delivered to IT Corporation, Vine Hill, for treatment or disposal, and the manifest copies were not returned to Bay Area Environmental, Inc. within 45 days. IT Corporation sent the manifest copies by telecopier on February 1, 1989. Thomas Meichtry stated that Bay Area Environmental, Inc. had repeatedly asked IT Corporation for the manifest copies. Thomas Meichtry stated that Bay Area Environmental, Inc. had not sent an Exception Report to the Department.

<u>Manifest No.</u>	<u>Date to Transporter</u>	<u>Date Accepted by TSDF</u>	<u>Date Manifest Returned</u>
87092803	August 3, 1988	August 3, 1988	February 1, 1989
87092804	August 4, 1988	August 4, 1988	February 1, 1989
87092806	August 11, 1988	August 11, 1988	February 1, 1989

2. Title 22, California Code of Regulations, Section 66374(a); Parts IV.2(c)(7), IV.2(e) Hazardous Waste Facility Permit.

Bay Area Environmental, Inc. stored more drums in the flammable storage bay than allowed by the Hazardous Waste Facility Permit. In a letter to Barbara Cook, dated December 8, 1988, Thomas Meichtry stated that Bay Area Environmental, Inc. was "technically out of compliance" for storage capacity in the flammables storage bay (Attachment 8).

3. Title 22, California Code of Regulations, Section 66374(1)(1); Parts II.6.(i):

Bay Area Environmental, Inc. increased the storage capacity of the flammables storage bay without providing 30 days prior notice to the Department.

In a letter dated February 1, 1988, David Burton informed Michael James, Chief of the Facility Permits Unit for Region 2, Toxic Substances Control Division, that Bay Area Environmental, Inc had in approximately May, 1987 added ten feet by 19 feet to the flammable waste drum storage area (Attachment 13). There is no record in Department's files that any prior notification was received by the Department.

4. Title 22, California Code of Regulations, Section 66374(m):

Bay Area Environmental, Inc. stored hazardous waste in a modified portion of the facility without submitting to the Department a letter, signed by the permittee and a professional engineer, registered in California, stating that the facility had been modified in compliance with the Permit.

David Burton, of Bay Area Environmental, Inc. wrote a letter to Michael James, Chief of the Facility Permits Unit, Toxic Substances Control Division, dated February 1, 1988, stating that in approximately May, 1987, Bay Area Environmental, Inc. had added ten feet to the flammable waste drum storage bay (Attachment 13).

During an inspection of Bay Area Environmental, Inc. on August 12, 1987, James McCammon observed 120 drums in the flammable drum storage bay. The Hazardous Waste Facility Permit allows 53 drums in the flammable storage area (Attachment 11, violation 1).

There is no record of a letter from Bay Area Environmental to the Department between May, 1987 and August, 1987, stating that the construction was in compliance with the Permit.

#### VIII. Observations:

On February 2, 1989 at 8:30 a.m., James McCammon and I met with Tom Meichtry and David Burton. Prior to the walk-through inspection, McCammon and I reviewed manifests dated back to 1987, training plans and records, inspection

logs, annual reports, contingency plan, financial responsibility requirements, closure costs update and copies of waste analysis.

**Records Review:**

We noted after review of the manifests that three manifests had not been received by the facility within 45 days after treatment or disposal. Mr. Tom Meichtry stated that Bay Area Environmental had not filed an Exception Report for three manifests dated August 3, 4 and 11, 1988. Mr. Meichtry stated that "After many phone calls IT Corporation of Vine Hill finally faxed the copies to BAE's office on February 1, 1989".

Mr. Burton provided copies of "Certificates of Completion" for "in-house" training in hazardous materials management. Records of classes are kept in each individual's personnel file.

We reviewed the Annual Report for 1987 and found no discrepancies. The contingency plan appeared adequate and Mr. Burton provided me with a copy.

Insurance coverage for vehicles were reviewed and found adequate. BAE operates two trucks, a 1974 GMC flatbed and 1985 Chevrolet 1 1/2 ton pick-up. Their vehicles do not transport out-of-state and are annually inspected by California Highway Patrol.

All waste analysis plans and records were maintained. The records were reviewed and contained analysis of hazardous waste in drums handled through BAE's facility.

McCammon and I reviewed their Closure Cost update/letter of credit for \$33,000.00 dated August 29, 1988 for clean-up and disposal of 448 drums. Closure costs appeared adequate.

After the opening interview we toured the facility. The following areas were reviewed:

**Maintenance Shop:**

The maintenance shop is used to store clean empty drums and also is used to receive household hazardous waste once a week, according to Meichtry. McCammon and I observed self-contained breathing apparatus (SCBA) units and extra cylinders on a rack next to the roll-away door. Safety

shower and the eyewash were operable and in close proximity to the intended user. Fire extinguishers were in good working order (Attachment 7, Photo 10).

**Rear Bay:**

McCammon and I observed two storage bays separated by a berm contained 58 55-gallon drums of Oxidizers and 28 55-gallon drums of flammables stored on wood pallets. Pallets were stacked in straight lines, one tier, and with ample aisle space to read and identify contents on labels.

Each bay sloped towards a sump near the center. All bays were clean and dry and sumps were empty. The flammable storage bay appeared to have a new concrete addition of approximately (10 x 19 feet) with a new ramp for forklift access. A seam of approximately (19) feet separated the new addition (Attachment 7, Photo No. 5). I voiced my concerns with Dave Burton and Tom Meichtry about spillage entering this exposed seam. Meichtry shared my concern and offered to seal the seam with epoxy.

I also observed a partial fire wall on the oxidizer bay's east side; (Attachment 7 photo No. 9) which does not meet the requirements as prescribed in Richmond's Fire Marshall's letter, dated February 2, 1983, which requires a "one hour fire resistant wall extending from the south-east corner of drum storage area" (See Attachment 12).

**Drum Count:**

Oxidizers 58, permitted 84  
Flammable 28, permitted 53

**Alkaline/Pesticides/Acid Storage Building:**

McCammon and I inspected and photographed the three separate bays within the metal building. McCammon counted 40 55-gallon drums in the caustic bay, 41 drums in the Pesticide bay and 24 drums in the acid bay. These counts were well within the permitted amounts. All bays appeared clean and dry. All drums were labeled and stored in good condition on wooden pallets. Eyewash, safety shower, fire extinguishers, facility alarm and lighting were in good working order (Attachment 7, Photos 6, 12).

**Transfer Area:**

I observed and photographed areas heavily damaged by vehicular traffic. This area may provide routes for groundwater infiltration if a spill occurs in this area



(See Attachment 7, Photos 1,2,3,4). Roll-away bins and a trailer occupied the perimeter of the transfer area. Two of the three monitoring wells were identified by Tom Meichtry and photographed (See Attachment 7, Photos 7, 8).

IX. Sampling Summary:

No samples were collected.

X. Discussion with Management:

McCammon briefly explained the violations found during the inspection with Burton and Meichtry. Copies of two prior inspections (May 11, 1988 and August 12, 1987) were left for Meichtry. Meichtry asked McCammon if they could use the 144 hour storage exemption as referenced in HSC, Section 25123.3.

XI. Attachments:

1. Generator checklist - 15 pgs.
2. Land Disposal checklist - 11 pgs.
3. Transporter checklist - 7 pgs.
4. Closure cost update - 4 pgs.
5. Uniform hazardous waste manifests - 5 pgs.
6. Training certificates of completion - 2 pgs.
7. Photographs - 2 pgs.
8. Minor modification and variance - 8 pgs.
9. Statement by Domestic Stock Corporation - 1 pg.
10. Maps of facility - 4 pgs
11. Inspection Report 8/12/87 - 7 pg.
12. Richmond's Fire Marshall letter 2/2/83
13. Memo to Mike James 2/1/88 - 3 pgs.

Ray Balcom  
Raymond Balcom  
Hazardous Waste Specialist

3-24-89  
Date Submitted

Charlene Williams  
Patricia C. Payne  
Senior Hazardous Waste Specialist

3-24-89  
Date Approved

7  
(1) West corner;  
roll-off bins

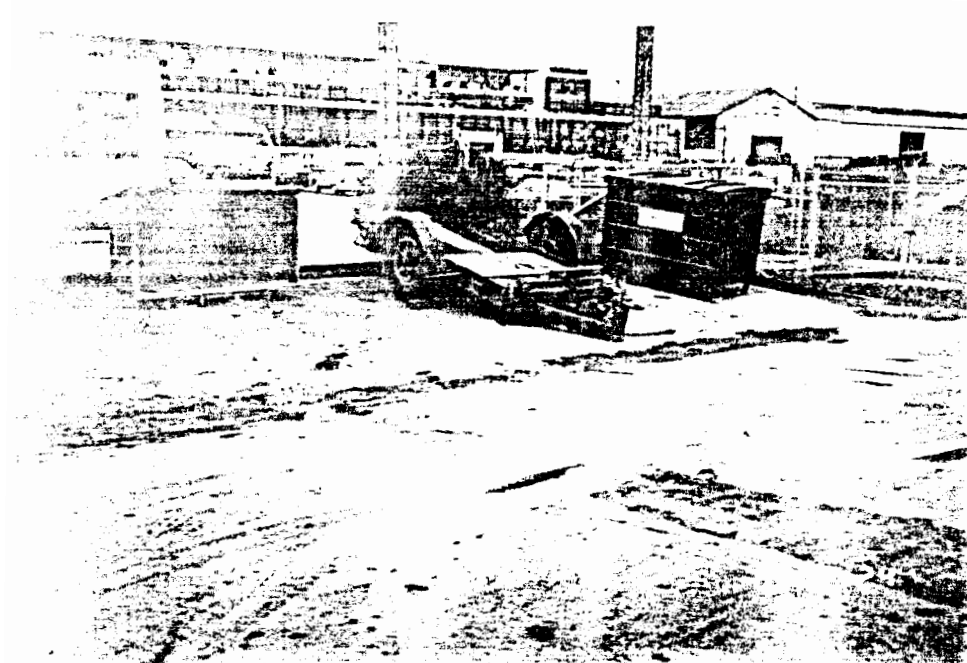


1  
(2) West - side,  
center, damaged  
asphalt.



2  
(3) West side ;  
note: wet stains,  
damaged asphalt.





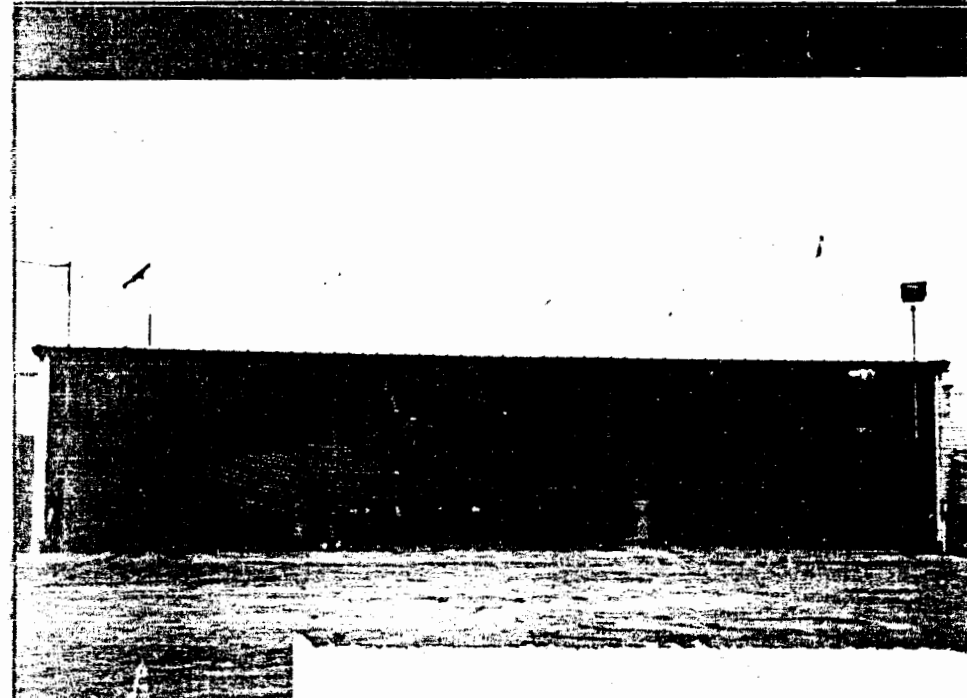
(4) Northerly direction; note: stains, direction of drainage.

4



(5) Oxidizers & Flammables Storage bay. note: concrete extension  $\pm 10$  feet (exposed seams).

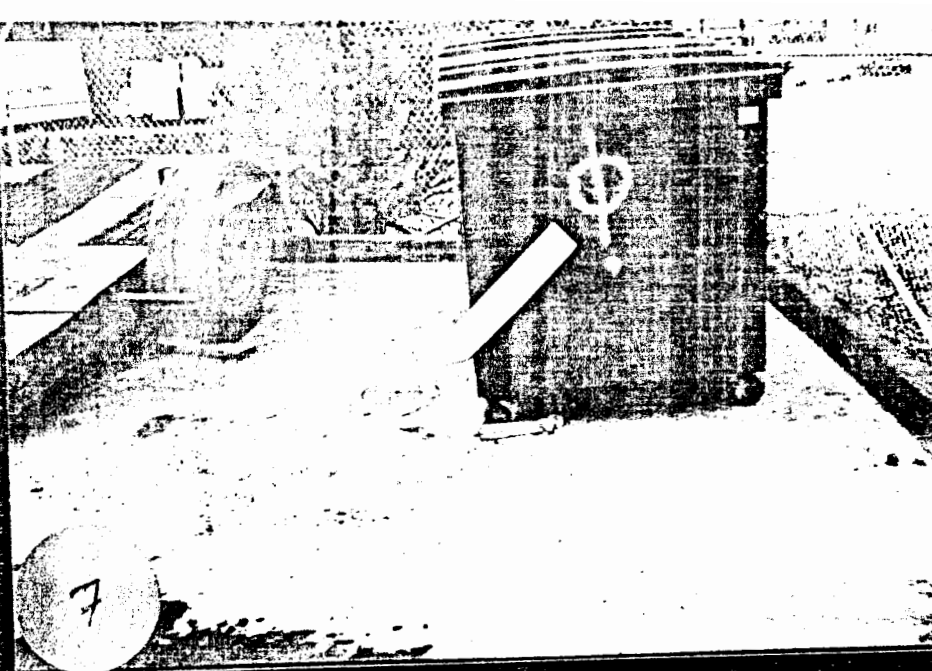
5



(6) South storage bay; pesticides, acids, and caustics.

6

(7) Monitoring well  
North corner.



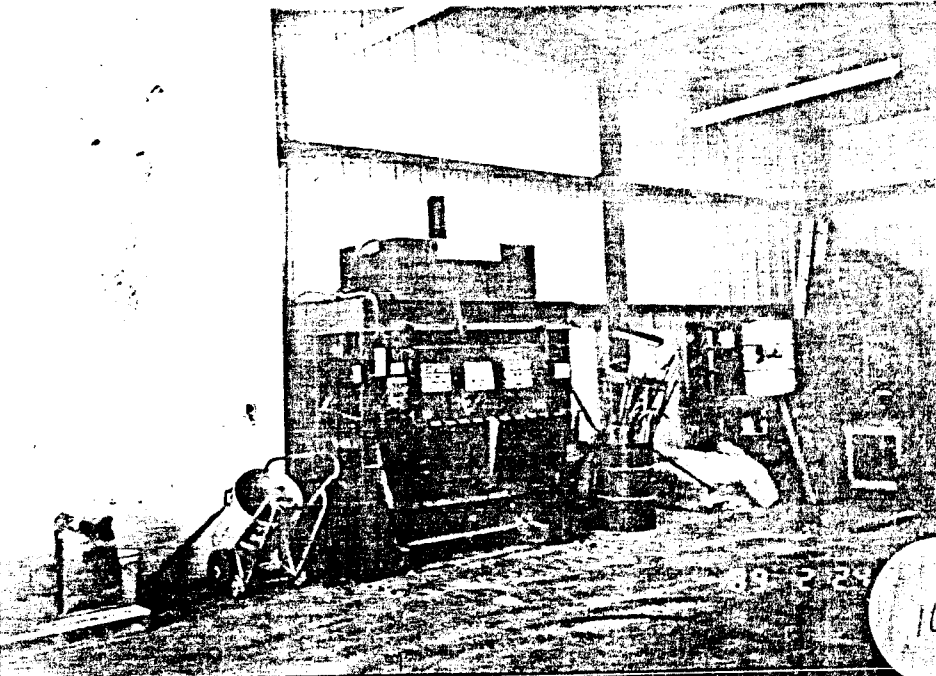
(8) Monitoring well  
next to maintenance  
shop's rollaway  
door.



(9) Oxidizer- Flammable storage  
bays; note: Fire wall does not  
extend full length of bay.

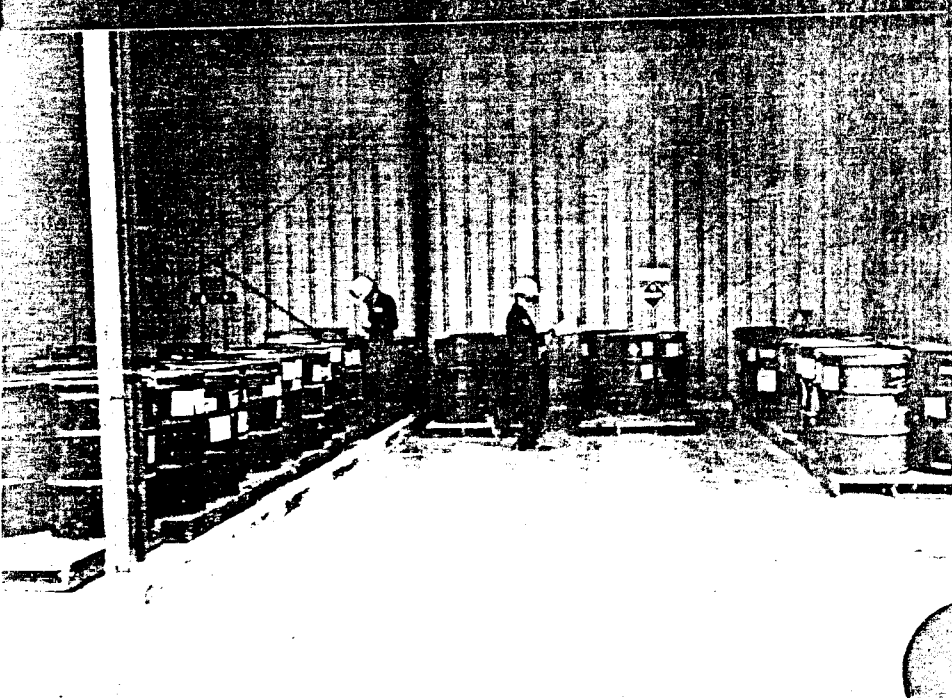






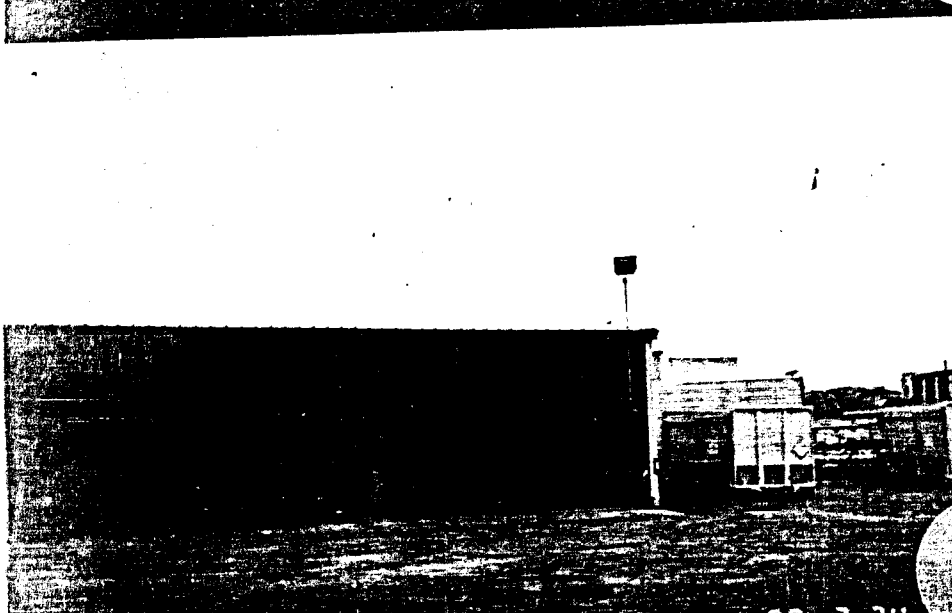
(10) Maintenance shop note:  
Drum crusher w/o containment.

10



(11) Oxidizers & Flammables  
Storage.

11



(12) South storage.

12

89 2 24



HAZARDOUS WASTE  
INSPECTION REPORT



DATE of INSPECTION 12 August 1987

FIRM NAME Bay Area Environmental SITE CLASSIFICATION RCRA ☒ Non RCRA ☐  
ADDRESS 1125 Hensly Street Major ☐ Non Major ☒  
Richmond, CA 94804 EPA I.D. NUMBER CAT 080014079  
INSPECTOR James McCammon, HMS/WME/AHMS 12 August 1987  
Date of Submittal

PURPOSE:

Inspection of permitted facility as follow up to complaints and a release on 20 July 1987 of hazardous wastes. (Attachments 6, 7)

BACKGROUND:

On 2 Aug. 1983, the Department of Health Services issued Bay Area Environmental a Hazardous Waste Facility Permit to act as a transfer station for hazardous wastes and to store hazardous wastes in drums. The facility was inspected on July 7, 1984, and no violations were observed; on June 26, 1985, the following violations were observed:

- 1) accepting some manifests without a generator EPA number. (Box 3 of Manifest)
- 2) drums were not labeled until they were shipped off site, and,
- 3) the training records did not contain a job description for the Chemical Technician job title.

Department of Health Services conducted a telephone investigation after a release on 20 July 1987 of hazardous waste. (Attachment 8)

PERSONS PRESENT:

David Burton, Bay Area Environmental  
Jim McCammon, Department of Health Services

*Signature*

DESCRIPTION OF FACILITY:

Bay Area Environmental consists of an industrial yard containing an office and laboratory building with an attached garage and drum storage area, and a separate drum storage area. The garage (Photo 21) is operated by J.J. Magana Corp., the parent company of Bay Area Environmental, and is not part of the latter facility. The two open-front drum storage areas (Photo 1) are divided into two and three bermed bays, respectively. The permitted total maximum capacities of the bays are:

acids, toxics, oxidizers	84 drums each
caustics	105 drums
flammables	53 drums

A letter (Attachment 2) from the Department on 14 November, 1984, approved, and incorporated into Bay Area Environmental's operation plan, the transfer of wastes between drums and from drums to trucks at the facility.

OBSERVATIONS:

Violations:

1. Sections 25190 and 25202, California Health and Safety Code; Parts IV.2. (c)(7), IV 2.(e), Hazardous Waste Facility Permit:

At the time of the inspection Bay Area Environmental was storing more drums than allowed by its permit in each of four bays. The approximate numbers of drums in each bay was:

<u>Bay Name</u>	<u>Drums present</u>	<u>Drums allowed by permit</u>	<u>Photo #</u>
acids	100	84	4
pesticides	100	84	5,6
caustics	130	105	6,7,8
flammables	120	53	15,16,17

The inspection logs for the last seven months show that at least one bay was above capacity most days since early May.

2. Section 67247(c) Title 22, California Code of Regulations; Parts III.12. (d) and IV. 2. (g)(3) Hazardous Waste Facility Permit; Section VIII, Operation Plan;

Incompatible wastes were not separated; drums containing acids were stored with caustics, drums containing poisons were stored with acids. (Photo 14) Drums belonging to hazard classes designated by the Permit were not being stored in the bays established for them in the Permit and Section VIII of the Operation Plan.

The following drums were observed in the wrong bays:

Caustics bay: 3 drums labeled acid (Photo 11, 12)

3 drums labeled paint

3 drums labeled oil

Acid bay: 4 drums labeled oily dirt (Photo 14)

1 drum labeled toluene

1 drum labeled poison B

Oxidizers Bay: 1 drum labeled poison

Owing to the lack of aisle space, only the outer-most drums in the bays could be examined.

3. Section 67124, Title 22, California Code of Regulations, Part III. 16. Hazardous Waste Facility Permit; Section VIII Operation Plan.

There was little or no aisle space between the drums within the bays. Except where the berms divided the bays, I could not pass between the rows of drums to inspect them; in most bays there was no aisle space at all. (Photo 1, 4, 5, 6, 7, 8, 13, 14, 15, 16, 19, 20).



4. Section 67163(b)(2), Title 22, California Code of Regulations; Part III. 20.(b)(ii) Hazardous Waste Facility Permit: .

Bay Area Environmental does not have records that cross reference each waste to specific manifests. David Burton could not find the manifest or any other records for a drum labeled 'Poison B' in the acid bay. The manifest number marked on the drum, 86490816, could not be located in Bay Area Environmental files and may not be the manifest under which the drum was sent to the facility. According to Burton, the drum had come to Bay Area Environmental after being refused at Casmalia.

5. Section 67163(b)(3), Title 22, California Code of Regulations; Part III. 20(b) (iii) Hazardous Waste Facility Permit:

Bay Area Environmental has not maintained records of waste analyses and determinations. David Burton was unable to provide any records for most of the wastes at the facility. He said that Bay Area Environmental did not have waste analysis records for most of the wastes received.

6. Section 67105(d), Title 22, California Code of Regulations; Part III. 11(e) Hazardous Waste Facility Permit; Part IX. A. Operation Plan:

Bay Area Environmental does not maintain the following training records:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

(2) A written job description for each position related to hazardous waste management. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall include the requisite skill, education or other qualifications and duties of employees assigned to each position.

(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position related to hazardous waste management.

(4) Records that document that the training or job experience required above has been given to, and completed by, facility personnel.

7. Section 67106(b), 67242, Title 22, California Administrative Code; Parts III. 12.(b) and IV.2.(b)(1) Hazardous Waste Facility Permit:

Waste containing nitric acid, nickel, and other acids were pumped from eighteen 55-gallon drums into four 450-gallon plastic containers on July 20th by Rollins Environmental at Bay Area Environmental, according to David Burton. Several hours after the transfer, at 7 p.m., the containers were discovered to be bulging, venting a brown gas and beginning to rupture. By 9:30 p.m., 1600 gallons of acid had spilled on the ground. Emergency crews from Bay Area Environmental and Rollins Environmental began diking the spill and spreading lime to neutralize the acid. (Chronology attached, Attachment 5). The cause of the reaction is still unknown. Bay Area Environmental has removed the upper layers of soil. The post-excavation soil was found to be neutral in pH and about 100 ppm nickel.

8. Section 25202 California Health and Safety Code; Part II. 6(k)(2) Hazardous Waste Facility Permit:

Bay Area Environmental has failed to submit within 5 days a written report to the Department of Health Services on the incident described in violation 7. David Burton produced records that telephone reports were made to the Department and to OES. John M. Gioia, attorney, has submitted copies of letters (Attachment 10) as evidence that he had informed the Department of the spill, in writing on 29 July 1987. There is no record that the Department received such a letter.

9. Parts IV. 1.(c) and VI. 2.(1) Hazardous Waste Facility Permit; Part VIII Operation Plan:

Hazardous wastes were stored outside the bermed part of the storage bays. Four drums were outside the acid and caustics bays and three 20-gallon drums and four 5 gallon pails were outside the flammables bay. (Photos 7, 8, 17)

10. Section 25202 California Health and Safety Code; Section 66374 (a) California Administrative Code; Part VIII, Operation Plan:

A pallet of small containers that had not been placed in drums were being stored in the caustics storage bay. (Photo 9)

11. Section 67143(e), Title 22, California Administrative Code; Part III. 18.(d)(4) Hazardous Waste Facility Permit:

Bay Area Environmental has failed to amend the contingency plan when the emergency coordinator changed.

12. Section 67121(a)(b), 67123(a), Title 22, California Administrative Code; Part III. 14. (c) Hazardous Waste Facility Permit:

There is no alarm or communications device to summon aid in the event of an emergency in the waste storage area.

OTHER OBSERVATIONS:

Drums with PCB labels were in various storage bays at the facility (Photo 10). David Burton showed me manifests that stated the PCBs were below the hazardous limit for solids. In a letter of February 9, 1987, (Attachment 4), he informed the Department of Bay Area Environmental's intent to accept these wastes.

Bay Area Environmental has installed a drum crusher in the oxidizers bay. In a letter on 22 May 1986 (Attachment 3) Bay Area Environmental informed the Department of its intent to install the drum crusher.

DISCUSSION WITH MANAGEMENT:

David Burton reviewed the events of the nitric acid spill, and explained that Rollins Environmental was completely in charge of the operation; Bay Area Environmental furnished only the space.

I asked David Burton about PCB wastes that had come from Lockheed Missiles and Space Company. (Attachment 9)

Burton said that the drums that had come from Lockheed, stored at Bay Area Environmental and rejected by IT, were manifested by Lockheed as ORM-E liquid, flammable liquid, waste oil and corrosive liquid, and that IT had said it had done its own analysis before IT picked up the wastes. IT pumped all the wastes into a vacuum truck and took it to Vine Hill, where IT discovered 4700 ppm PCBs in the load.

SAMPLES:

None

PHOTOS:

Attached

ATTACHMENTS:

- 1) Letter Wahbeh to Bruhns, Nov. 5, 1984.
- 2) Letter Hoenig, to Wahbeh, Nov. 14, 1984.
- 3) Letter Wahbeh to Murphy, May 22, 1986.
- 4) Letter Burton to Murphy, Feb. 9, 1987.
- 5) Memo Magana to Sisneros no date.
- 6) Complaint No. 4077
- 7) Complaint 3/20/87, anonymous
- 8) Hazardous Waste Inspection Report, 20 July 1987, Tim Potter
- 9) Memo: P. Kewin to S. Stack, E. Koehler, L. Castillo, T. Potter, July 23, 1987.
- 10) Letters Gioia to McCammon 24 August 1987, Gioia to Murphy 29 July 1987, Memo (same as Attachment 5).
- 11) Generator Checklist



**BAY AREA  
ENVIRONMENTAL**

**July 20, 1987**

**Bay Area Environmental Samples**

<b>Sample</b>	<b>pH</b>	<b>Acid Normality</b>
<b>BAE-001</b>	<b>0.80</b>	<b>2</b>
<b>BAE-002</b>	<b>1.73</b>	<b>1.6</b>
<b>BAE-003</b>	<b>1.0</b>	<b>1.2</b>
<b>BAE-004</b>	<b>0.73</b>	<b>2.6</b>
<b>BAE-005</b>	<b>0.66</b>	<b>3.3</b>



HAZARDOUS WASTE  
INSPECTION REPORT



DATE of Incident July 20, 1987

FIRM NAME Bay Area Environmental

SITE CLASSIFICATION RCRA ☒ Non RCRA ☐

ADDRESS 1125 Hensley Street

Major ☐ Non Major ☒

Richmond, CA 94801

EPA I.D. NUMBER CAT 080014079

INSPECTOR Tim Potter

HMS/WME/AHMS September 11, 1987  
Date of Submittal

PURPOSE:

Telephone interviews to investigate an alleged release of hazardous wastes on July 20, 1987 at Bay Area Environmental (BAE).

BACKGROUND:

The Department received a call on July 21, 1987 from a reporter for the West County Times who had reported on an emergency call about a release at BAE. The reporter stated that the Richmond Police and Fire Departments were the first emergency response personnel on the scene. Contra Costa County Health Department staff responded to the incident later in the evening.

PERSONS INTERVIEWED:

Bruce Benike, Contra Costa County Health Department  
Don McLanahan, Richmond Fire Department  
Sergeant Bajza, Richmond Police Department  
Tim Potter, DHS; Conducted interviews

FACILITY DESCRIPTION:

BAE is a permitted Hazardous Waste Facility which is authorized to receive hazardous wastes from off-site generators for transfer/storage purposes. Wastes received at BAE are transported to other facilities for treatment and disposal.

OBSERVATIONS:

The Richmond Police and Fire Departments responded to a call from an employee of a business located next to BAE who heard a "bang" at the BAE facility. When police and fire department staff arrived on the scene, a vapor cloud was observed to be coming

Sr. HMS/Sr. WME

See Back

DATE of REPORT

9/17/87

Bay Area Environmental  
Inspection Report  
Page 2

from the yard of the BAE facility. The street was blockaded and the neighboring businesses were evacuated. Based on information provided by the Contra Costa County Department of Health Services and because of a wind shift, the police department staff did not conduct an evacuation of the residences in the area.

Four 300 gallon portable polyethylene tanks in steel cages were stored in the BAE yard along the rear property line. These tanks were stored on a pervious base of gravel and soil. One tank was observed to be leaking when the police and fire department responded to the call. Two of the four tanks ruptured while the police and fire department were at the site, and the fourth tank appeared to be under pressure. No labels or identifying information were observed to be present on these tanks.

Bruce Benike provided an estimate that 500 to 600 gallons of wastes were released on-site. The fire department staff dyked the storm drain in the yard of the facility to prevent a discharge. The vapor cloud that was released did travel off-site.

Bruce Benike requested from BAE staff copies of the manifests for the transportation of the wastes to BAE. This information could not be provided at the time of the incident. Bruce Benike stated that he expected to receive the manifest data within several days after my telephone conversation with him on July 23, 1987. I requested that he submit copies of this manifest data to the Department when he receives it.

Approximately 900 gallons of an acid mixture had been delivered to the BAE facility in 55-gallon drums approximately one week prior to the incident. The wastes were reported to have been generated at a military base. The management of the wastes was contracted to Rollins Environmental by the DRMO in Alameda within the Department of Defense. The wastes were transferred from the 55-gallon drums to the four containers earlier in the day when the incident occurred. Bruce Benike stated that he received information that it was Rollins Environmental's staff who actually conducted the transfer of the wastes.

Rollins Environmental Services from San Jose was contacted to respond to the spill and to conduct the clean-up of the spilled wastes. BAE did not implement its contingency plan to respond to this clean-up. The Department was not notified by BAE of this incident.

Bay Area Environmental  
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Page 3

BAE owner, Jesus Magana, and general manager, Bob Sisneros, were called to the scene. Neither of these individuals could identify the material inside the leaking containers. The content of the containers was eventually identified to be a mixture of acids (30% sulfuric, 30% hydrochloric, 30% nitric) with copper and 10% water. This identification occurred approximately 1 hour 20 minutes after the police and fire department staff arrived at the scene, and approximately 50 minutes after Jesus Magana and 20 minutes after Bob Sisneros arrived at the site.

Violations (Permit Sections are not cited):

Section 66508(a) and (b), Title 22, California Administrative Code (CAC). BAE did not properly label containers holding hazardous wastes that were stored at its facility.

Section 67102(a)(1), CAC. BAE did not obtain a detailed chemical and physical analysis of hazardous wastes so that the waste could be properly stored at its facility.

Section 67120(a), CAC. BAE has not operated its facility in a manner that minimizes the release of hazardous wastes or hazardous waste constituents to the environment.

Section 67140(b), CAC. BAE did not immediately carry out its contingency plan in response to a release of hazardous waste at its facility.

Section 67145(j), CAC. BAE did not submit a written report to the Department within 15 days of an incident that required implementation of the facility's contingency plan.

Section 67164(a), CAC. BAE could not provide a delegated representative of the Department with manifest data that was requested for inspection.

Section 67243(b), CAC. BAE has handled and stored containers holding hazardous waste in a manner that caused the container to rupture and leak.

Section 67245, CAC. BAE has stored containers holding hazardous waste in area of its facility that was not designed and constructed with an appropriate containment system.

RECOMMENDATIONS:

A facility inspection should be conducted in response to this incident. A Report of Violations should be issued to BAE for the



Bay Area Enironmental  
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Page 4

violations associated with this incident.

Bruce Benike stated that Contra Costa County would not be issuing a Report of Violation for the violations associated with this incident. The police memorandum dated July 21, 1987 which summarizes the incident at BAE states that Bruce Benike informed the police at the scene that "there were no violations of the law" (Attachment 1). This misinformation should be addressed in subsequent coordination meetings between the Department and the MOU counties.

ATTACHMENTS:

1. Police memorandum dated July 21, 1987 summarizing the release of hazardous waste at BAE on July 20, 1987.
2. Notes for telephone conversations with persons interviewed.

Memorandum: July 21, 1987  
Police Department

Attachment 1

TO: A/Captain D. Seiberling  
A/Lieutenant D. Berry

From: A/Sergeant D. Mussetter

Subject: Hazardous Chemical Leak at 1125 Hensley Avenue - Bay Area Environmental

Synopsis:

On 20Jul87, at 1820 Hours, an employee at 1111 Hensley Avenue, reported an explosion occurred at 1125 Hensley Avenue, Bay Area Environmental, a hazardous waste storage-transfer facility. I was first to arrive on scene with R.F.D. The business was closed and the property was secured by a fence and locked gate.

I observed no damage, fire or smoke initially. I received additional information that the explosion was from a chemical drum in the open yard.

R.F.D. cut the lock from the gate to enter because we observed vapor in the form of a small yellow cloud blowing in a N/NE direction from the southwest area in the yard.

I set up a command post upwind from the escaping vapor and directed a unit to respond to Willard/Hensley Avenue from a safe direction to block vehicular and pedestrian traffic from entering the area and being exposed to the fumes. Traffic was blocked at 7th Street/Hensley Avenue and Willard/Hensley.

The fumes were emanating from one or more tanks in the yard. R.F.D. advised that there were no markings on the tanks and they were leaking. The area was quickly secured and owner of the business was called to the scene to identify the material. The owner arrived, Mr. Jesus Magana, and he called in his General Manager, Bob Sisneros.

They could not immediately identify the material. A/Lieutenant Berry had arrived and the Department of Health Services - Environmental Health Division was called to respond to the scene.

The material was subsequently identified as acid that had been brought to the facility by Rollins Environmental Service, Inc. Rollins Environmental Service responded to the scene to clean up the spillage. Upon the arrival of the Health Services personnel and Rollins Environmental personnel, it was found that the material was 30% Hydrochloric Acid, 30% Nitric Acid, 30% Sulfuric Acid and 10% Water. The acid was harmful, only if breathed in strong concentrations and very dangerous to touch or handle without proper protective gear.

The wind was blowing hard and Mr. Benike of Environmental Health advised no evacuation was needed. The Department of Health Services personnel were supervising the clean-up operation by Rollins Environmental Service, Inc. Bruce Benike of Health Services advised that three of the four tanks had ruptured from pressure within the tanks causing the acid leak onto the ground, causing a vapor cloud. Mr. Bob Sisneros and Mr. James Wells reported that Rollins Environmental Service transported approximately 900 gallons of the acid to Bay Area Environmental approximately one week ago, stored in 55 gallon drums.

Today, Rollins Environmental personnel brought four new 300 gallon poly-tanks to Bay Area Environmental Service. They transferred the acid from the 55 gallon drums into the four 300 gallon poly-tanks. The tanks are a newly developed tank and are Department of Transportation approved for acid. The four poly-tanks were to be transported tomorrow for disposal.

Mr. Hanson of Rollins Environmental Service said the acid also contained trace amounts of copper. Mr. Hanson and Mr. Benike theorize that either the copper caused the acids to react in the tanks causing high pressure to build up and burst the tanks or the capabilities of the tanks were misrepresented by their manufacturers. The tanks did not explode, but burst due to pressure.

Rollins personnel were going to use soda ash on the acid to neutralize it and relieve the pressure on the remaining tank that was about to burst. Rollins personnel estimated that approximately 600 gallons had leaked out of the three ruptured tanks.

Mr. Benike of the Environmental Health Services said that after the acid has been neutralized and the pressure from the fourth tank had been relieved, the road could be opened because there would be no health threat or danger.

Mr. Benike said he was leaving the scene after the acid was neutralized. He said the clean up would occur tomorrow. He said there were no violations of the law.

Officer Thompson took three photographs of the leak with Pentax Camera #34, envelope 000072.

Agencies and Personnel:

RPD

A/Lieutenant Berry  
A/Sergeant Mussetter  
Officer Goldberg  
Officer M. Brooks  
Officer Dixon  
Officer Maday  
Officer Thompson

RFD Fire Fighters

Bruce Benike - Department of Health Services  
1111 Ward Street, Martinez 372-2286

Roger Lewis - Department of Health Services

Jesus J. Magana - Owner of Bay Area Environmental  
1125 Hensley Avenue, 233-8001

R. J. Sisneros - General Manager, Bay Area Environmental

John Tillman - Bay Area Environmental

Terry Wells - Bay Area Environmental

Doug Hanson - Rollins Environmental Services, Inc.  
2305 Paragon Drive, San Jose, 408/435-8580

James T. Wells - Rollins Environmental Services

Mark Parquette, Chemist - Rollins Environmental Services

Chronological Order of Events:

1820 Hours - Arrived and set up a Command Post -  
Sanford/Kelsey intersection blocked by Y5.  
1834 Hours - Leo/Willard Avenue traffic blocked by W4.  
1840 Hours - Hensley Avenue South of Willard Avenue blocked  
by W4 and Y5.  
1844 Hours - Advised 10 minute ETA of the business owner.  
R.F.D. cannot identify the material.  
1848 Hours - Business owner arrives, Jesus Magana.  
1851 Hours - Jesus Magana enters building and telephones  
staff.

1857 Hours - Identify leak coming from one or more of four containers. Containers are swelling and appear to be going to rupture.

1907 Hours - Office of Emergency Services called - They will call back in 15 minutes.

1915 Hours - Reporter Carrie Hamell of the West County Times arrives.

1919 Hours - Wind changes direction to the N/E(est.).

1921 Hours - Bob Sisnero's arrives and goes to business to check inventory papers to identify the material.

1936 Hours - Office of Emergency Services call A/Lieutenant Berry at the Command Post. A/Lieutenant Berry is advised to call Bruce Benike at the Department of Health Services. O.E.S. not responding.

1939 Hours - Considering evacuating some homes on Sanford Avenue and Willard Avenue, but wind now blowing more easterly.

1940 Hours - Bob Sisneros advised that the material is acid - 30% Sulfuric, 30% Hydrochloric, 30% Nitric and 10% Water.

1944 Hours - A/Lieutenant Berry telephoned Bruce Benike. Y5 and W4 advised that the vapor is not blowing toward Willard Avenue and Sanford Avenue.

1955 Hours - A/Lieutenant Berry advised by Bruce Benike that a secure area of 1 to 1-1/2 blocks around the leak are sufficient. It is harmful to breath for prolonged periods and it is very dangerous to be near or touch without proper protective gear.

Advised that Rollins Environmental is responding from San Jose for the clean up; to be supervised by Bruce Benike and Roger Lewis.

2005 Hours - Terry Wells and Doug Hanson of Rollins arrive. R.F.D. moves to 7th Street/Essex.

2014 Hours - Barricades from Corp. Yard are ordered.

2019 Hours - Wind shifts to north direction.

2035 Hours - Evidence Technician Thompson takes photographs of scene.

2051 Hours - Roger Lewis - D.H.S. arrives. Mark Parquette and Jim Wells arrive.

2100 Hours - Barricades for street arrives.

2119 Hours - Bruce Benike arrives.

2141 Hours - Owner - Jesus Magana leaves scene.

2200 Hours - Benike and Lewis examine tanks and advise that three tanks are ruptured and 600 gallons of acid are spilled. There are no violations.

2217-2227 Hours - Truck and crew from Rollins arrive for clean up operation.

0115 Hours - The scene is stabilized and there is no longer any health threat.

All police personnel are relieved of their post.

DM/bas

cc: Lieutenant R. Becker



June 16, 1988

Mr. Dan Murphy  
Department of Health Services  
Toxic Substance Control Division  
Berkeley, CA 94704

06-347  
Dan F

Dear Mr. Murphy:

I have enclosed Bay Area Environmental's monthly report, which covers the period of May 1, 1988 to May 31, 1988.

Sincerely,

David Burton  
Facility Manager

*David Burton*  
DMB/cmc

Enclosures

Monthly Report  
Summary Sheets  
70 Manifests  
1 Non-Haz Manifests  
8 Homeowner receipts

7. Section 67106(b), 67242, Title 22, California Code of Regulations:

On or about 20 July, 1987, Bay Area Environmental failed to prevent the accidental reaction of hazardous wastes which resulted in the generation of extreme heat, pressure, release of toxic mists or gases, and uncontrolled release of hazardous wastes onto the soil, in violation of Parts III.12. (b) and IV. 2.(b)(1) of the Hazardous Waste Facility Permit.

<b>ICF</b>	TECHNOLOGY
DOCUMENT SOURCE	
DOHS _____	RWQCB _____
OTHER <input checked="" type="checkbox"/> _____	DATE _____

## 7. RESPONSE

At the time of the incident the polyethylene portable tank enclosed in a steel frame had an authorized exemption DOT-E9503. (See enclosed DOT document).

The acid had been transferred from black poly drums between 2-4 pm into the portable tank reference above for shipment to a precious metals recycling facility.

The portable tank was opaque and the direct sunlight through the opaque plastic wall allowed the U.V. light to catalyze the reaction of the acid and subsequently the pressure caused the release of toxic mists into the soil. At approximately 6:20 pm.

Subsequently, we understand that these portable tanks are no longer recommended for storage of nitric acid.

We have changed our policy regarding outside contractors working on our facility. Only Authorized Emergency Response contractors are allowed to work on our facility.



(k) 24-Hour Reporting

The owner or operator shall report to the California State Department of Health Services any noncompliance which may endanger health or the environment. Any information shall be provided verbally within 24 hours from the time the owner or operator becomes aware of the circumstances. The following shall be included as information which must be reported verbally within 24 hours:

- (1) Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies.
- (2) Any information of a release or discharge of hazardous waste, or of a fire or explosion from the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
  - (i) Name, address, and telephone number of the owner or operator;
  - (ii) Name, address, and telephone number of facility;
  - (iii) Date, time and type of incident;
  - (iv) Name and quantity of material(s) involved;
  - (v) The extent of injuries, if any;
  - (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
  - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within five days of the time the owner or operator becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times), and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

The owner or operator need not comply with the 5-day written requirement if the California State Department of Health Services waives that requirement and the owner or operator submits a written report within 15 days of the time the owner or operator becomes aware of the circumstances.

(l) Other Noncompliance

The owner or operator shall report all other instances of noncompliance not otherwise required to be reported at the time monitoring or other

# code of federal regulations

Protection of  
Environment

**40**

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PARTS 190 to 399

Revised as of July 1, 1982

CONTAINING  
A CODIFICATION OF DOCUMENTS  
OF GENERAL APPLICABILITY  
AND FUTURE EFFECT

AS OF JULY 1, 1982

*With Ancillaries*

Published by  
the Office of the Federal Register  
National Archives and Records Service  
General Services Administration

as a Special Edition of  
the Federal Register



(2) As used in paragraph (a)(1) of this section:

(i) "Fault" means a fracture along which rocks on one side have been displaced with respect to those on the other side.

(ii) "Displacement" means the relative movement of any two sides of a fault measured in any direction.

(iii) "Holocene" means the most recent epoch of the Quaternary period, extending from the end of the Pleistocene to the present.

*Comment:* Procedures for demonstrating compliance with this standard in Part B of the permit application are specified in 122.25(a)(11). Facilities which are located in political jurisdictions other than those listed in Appendix VI of this Part, are assumed to be in compliance with this requirement.]

(b) *Floodplains.* (1) A facility located in a 100-year floodplain must be designed, constructed, operated and maintained to prevent washout of any hazardous waste by a 100-year flood unless the owner or operator can demonstrate to the Regional Administrator that procedures are in effect which will cause the waste to be removed safely, before flood waters can reach the facility, to a location where the wastes will not be vulnerable to floodwaters.

*Comment:* The location where wastes are moved must be a facility which is either permitted by EPA under Part 122 of this Chapter, authorized to manage hazardous waste by a State with a hazardous waste management program authorized under Part 123 of this Chapter, or in interim status under Parts 122 and 265 of this Chapter.]

(2) As used in paragraph (b)(1) of this Section:

(i) "100-year floodplain" means any land area which is subject to a one percent or greater chance of flooding in any given year from any source.

(ii) "Washout" means the movement of hazardous waste from the active portion of the facility as a result of flooding.

(iii) "100-year flood" means a flood that has a one percent chance of being equalled or exceeded in any given year.

*Comment:* (1) Requirements pertaining to other Federal laws which affect the location and permitting of facilities are found in 22.12 of this Chapter. For details relative

to these laws, see EPA's manual for SEA (special environmental area) requirements for hazardous waste facility permits. Through EPA is responsible for complying with these requirements, applicants are advised to consider them in planning the location of a facility to help prevent subsequent project delays.]

[46 FR 2848, Jan. 12, 1981]

### Subpart C—Preparedness and Prevention

#### § 264.30 Applicability.

The regulations in this subpart apply to owners and operators of all hazardous waste facilities, except as § 264.1 provides otherwise.

#### § 264.31 Design and operation of facility.

Facilities must be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

#### § 264.32 Required equipment.

All facilities must be equipped with the following, unless it can be demonstrated to the Regional Administrator that none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

(a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;

(b) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams;

(c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and

(d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or auto-

matic sprinklers, or water spray systems.

[*Comment:* Part 122, Subpart B, of this Chapter requires that an owner or operator who wishes to make the demonstration referred to above must do so with Part B of the permit application.]

#### § 264.33 Testing and maintenance of equipment.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.

#### § 264.34 Access to communications or alarm system.

(a) Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless the Regional Administrator has ruled that such a device is not required under § 264.32.

(b) If there is ever just one employee on the premises while the facility is operating, he must have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, unless the Regional Administrator has ruled that such a device is not required under § 264.32.

#### § 264.35 Required aisle space.

The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless it can be demonstrated to the Regional Administrator that aisle space is not needed for any of these purposes.

[*Comment:* Part 122, Subpart B, of this Chapter requires that an owner or operator who wishes to make the demonstration referred to above must do so with Part B of the permit application.]

#### § 264.36 [Reserved]

#### § 264.37 Arrangements with local authorities.

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

### Subpart D—Contingency Plan and Emergency Procedures

#### § 264.50 Applicability.

The regulations in this subpart apply to owners and operators of all hazardous waste facilities, except as § 264.1 provides otherwise.

#### § 264.51 Purpose and implementation of contingency plan.

(a) Each owner or operator must have a contingency plan for his facility. The contingency plan must be designed to minimize hazards to human

### Subpart E—Manifest System, Recordkeeping, and Reporting

#### § 264.70 Applicability.

The regulations in this subpart apply to owners and operators of both on-site and off-site facilities, except as § 264.1 provides otherwise. Sections 264.71, 264.72, and 264.76 do not apply to owners and operators of on-site facilities that do not receive any hazardous waste from off-site sources.

#### § 264.71 Use of manifest system.

(a) If a facility receives hazardous waste accompanied by a manifest, the owner or operator, or his agent, must:

(1) Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received;

(2) Note any significant discrepancies in the manifest (as defined in § 264.72(a)) on each copy of the manifest;

[Comment: The Agency does not intend that the owner or operator of a facility whose procedures under § 264.13(c) include waste analysis must perform that analysis before signing the manifest and giving it to the transporter. Section 264.72(b), however, requires reporting an unreconciled discrepancy discovered during later analysis.]

(3) Immediately give the transporter at least one copy of the signed manifest;

(4) Within 30 days after the delivery, send a copy of the manifest to the generator; and

(5) Retain at the facility a copy of each manifest for at least three years from the date of delivery.

(b) If a facility receives, from a rail or water (bulk shipment) transporter, hazardous waste which is accompanied by a shipping paper containing all the information required on the manifest (excluding the EPA identification numbers, generator's certification, and signatures), the owner or operator, or his agent, must:

(1) Sign and date each copy of the manifest or shipping paper (if the manifest has not been received) to certify that the hazardous waste covered by the manifest or shipping paper was received;

(2) Note any significant discrepancies (as defined in § 264.72(a)) in the manifest or shipping paper (if the manifest has not been received) on each copy of the manifest or shipping paper.

[Comment: The Agency does not intend that the owner or operator of a facility whose procedures under § 264.13(c) include waste analysis must perform that analysis before signing the shipping paper and giving it to the transporter. Section 264.72(b), however, requires reporting an unreconciled discrepancy discovered during later analysis.]

(3) Immediately give the rail or water (bulk shipment) transporter at least one copy of the manifest or shipping paper (if the manifest has not been received);

(4) Within 30 days after the delivery, send a copy of the signed and dated manifest to the generator; however, if the manifest has not been received within 30 days after delivery, the owner or operator, or his agent, must send a copy of the shipping paper signed and dated to the generator; and

[Comment: Section 262.23(c) of this chapter requires the generator to send three copies of the manifest to the facility when hazardous waste is sent by rail or water (bulk shipment).]

(5) Retain at the facility a copy of the manifest and shipping paper (if signed in lieu of the manifest at the time of delivery) for at least three years from the date of delivery.

(c) Whenever a shipment of hazardous waste is initiated from a facility, the owner or operator of that facility must comply with the requirements of Part 262 of this chapter.

[Comment: The provisions of § 262.34 are applicable to the on-site accumulation of hazardous wastes by generators. Therefore, the provisions of § 262.34 only apply to owners or operators who are shipping hazardous waste which they generated at that facility.]

[45 FR 33221, May 19, 1980, as amended at 45 FR 86970, 86974, Dec. 31, 1980]

#### § 264.72 Manifest discrepancies.

(a) Manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest or shipping paper, and the quantity or type of hazardous waste a facility actually receives. Significant

discrepancies in quantity are: (1) For bulk waste, variations greater than 10 percent in weight, and (2) for batch waste, any variation in piece count, such as a discrepancy of one drum in a truckload. Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest or shipping paper.

(b) Upon discovering a significant discrepancy, the owner or operator must attempt to reconcile the discrepancy with the waste generator or transporter (e.g., with telephone conversations). If the discrepancy is not resolved within 15 days after receiving the waste, the owner or operator must immediately submit to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue.

#### § 264.73 Operating record.

(a) The owner or operator must keep a written operating record at his facility.

(b) The following information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility:

(1) A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by Appendix I;

(2) The location of each hazardous waste within the facility and the quantity at each location. For disposal facilities, the location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. For all facilities, this information must include cross-references to specific manifest document numbers, if the waste was accompanied by a manifest;

[Comment: See § 264.119 for related requirements.]

(3) Records and results of waste analyses performed as specified in §§ 264.13, 264.17, and 264.341;

(4) Summary reports and details of all incidents that require implement-



U.S. Department  
of Transportation

Research and  
Special Programs  
Administration

400 Seventh St. S.W.  
Washington, D.C. 20590

DOT-E 9503

1. Rotational Molding, Inc., Gardena, California, , is hereby granted an exemption from those provisions of this Department's Hazardous Materials Regulations specified in paragraph 5 below to manufacture, mark, and sell the packaging described in paragraph 7 below for use in the transportation of the corrosive materials, flammable liquids or an oxidizer described in paragraph 3 below in commerce subject to the limitations and special requirements specified herein. This exemption authorizes the use of a non-DOT specification rotationally molded, polyethylene portable tank enclosed in a steel frame, for the shipment of corrosive materials, flammable liquids, or an oxidizer, and provides no relief from any regulation other than as specifically stated.

2. BASIS. This exemption is based on Rotational Molding, Inc.'s application dated August 28, 1985, submitted in accordance with 49 CFR 107.103 and the public proceeding thereon.

3. HAZARDOUS MATERIALS (Descriptor and class).

(a) Corrosive liquids for which a DOT-34 reusable polyethylene container is prescribed in 49 CFR Part 173, and which have no secondary hazards and a vapor pressure of no greater than 14.7 psia at 130°F., classed as corrosive material.

(b) Hydrogen peroxide solution in water containing 52 percent or less hydrogen peroxide by weight, classed as an oxidizer.

(c) Isopropyl alcohol, ethyl alcohol, and methyl alcohol classed as flammable liquids; flammable liquids compatible with polyethylene which have no secondary hazards and have a flash point of 73°F. or higher; and other flammable liquids which have been specifically identified to, and acknowledged in writing, by the Office of Hazardous Materials Transportation (OHMT) prior to the first shipment.

4. PROPER SHIPPING NAME (49 CFR 172.101). Specific chemical name or generic description, as appropriate.

5. REGULATION AFFECTED. 49 CFR Part 173, subpart F; 173.119, 173.125, 173.266, 178.19, 178.253.

6. MODES OF TRANSPORTATION AUTHORIZED. Motor vehicle, rail freight.

7. SAFETY CONTROL MEASURES.

a. Packaging prescribed is a non-DOT specification rotationally molded polyethylene portable tank having a nominal water capacity of 300 gallons enclosed in an outer steel frame. The polyethylene portable tank has no bottom outlets and must be as shown on Rotational Molding, Inc. drawings DOT001-885 through DOT0004-885 on file with the OHMT. Each tank must be constructed in compliance with 49 CFR 178.19 except as follows:

- i. 178.19-2(a) - Does not apply. Instead, container must be rotationally molded of polyethylene which has been specifically identified to and is acceptable to the OHMT.
- ii. 178.19-3 - Minimum thickness of container must be 0.224 inch.
- iii. 178.19-4 - Does not apply.
- iv. 178.19-6(a) - Does not apply. Instead, each portable tank must be permanently marked by embossment or with a metal certification plate permanently affixed to each tank. The markings must be in letters and numbers at least 1/4-inch high located on the side of the tank. The markings shall be understood to certify that the portable tank complies with all requirements of this exemption and contain at least the following information:
- DOT-E 9503 portable tank  
Tank Manufacturer \_\_\_\_\_  
Test pressure 15 psig.  
Serial number \_\_\_\_\_  
Date of manufacture month/year  
Tare weight \_\_\_\_\_ lbs.  
Rated gross weight \_\_\_\_\_ lbs.  
Capacity \_\_\_\_\_ U.S. gal.
- v. 178.19-7(a)(3) - Changed to read: Each portable tank shall be tested by retaining for 5 minutes, hydrostatic pressure of at least 15 psig at equilibrium without leakage or pressure drop.
- vi. 178.19-7(c)(2) - Does not apply.

b. Each tank must be fitted with a pressure relief device that will limit the pressure in the tank to 15 psig and is in accordance with 49 CFR 178.253-4 except as follows:

## (i) 178.253-4(a)

- Frangible devices are not authorized.

## (ii) 178.253-4(c)(1)

- The pressure relief device must open at not less than 10 psig and not over 15 psig.
- The minimum venting capacity for pressure activated vents must be 6,000 SCFH at not more than 15 pounds per square inch gage.

## (iii) 178.253-4(c)(3)

- A fusible device that will function at a temperature no greater than 250°F may be used provided the vapor pressure in the tank at 250°F does not exceed 15 psig.

c. Portable tanks must be capable of satisfactorily withstanding the drop test and hydrostatic pressure test prescribed in 49 CFR 178.19-7(a), the stacking and lifting device tests prescribed in 49 CFR 178.251-5(a)(2), and the vibration test prescribed in 49 CFR 178.253-5(a)(1).

d. Each portable tank must possess the chemical and physical properties as reported to the OHMT by the petitioner's letter dated August 28, 1985.

e. Any changes in design, resin, or process methods must be approved by the OHMT. Prototype test results for the tests required in paragraph 7.c. of this exemption must accompany any request for changes in design, resin, or process methods.

f. Reuse of any portable tank must be in accordance with the applicable requirements of 49 CFR 173.28 and 173.32(f) as modified herein. Each portable tank must be hydrostatically retested in accordance with 49 CFR 173.32(f) as applicable to DOT Spec. 57 tanks, at a test pressure of 15 psig for 5 minutes without a drop in pressure or leakage. Any tank that fails must be rejected and may not be used again for the transportation of hazardous materials. The date of the most recent periodic retest must be marked near the tank identification markings required in 7, a, iv of this exemption. The owner of the tank or his authorized agent must retain a written record indicating the date and results of all required tests and the name and address of the tester, until the next retest has been satisfactorily completed and recorded.

g. Portable tanks having any portion of their molded body or components repaired are not authorized.



h. Commodities must be compatible with the polyethylene (PE) portable tank, and must not permeate the PE to an extent that a hazardous condition could be caused during transportation and handling.

i. Any fitting used must be protected in accordance with 49 CFR 178.253-3.

j. The sides of each portable tank must be marked "KEEP THIS END UP" in two places, 180 degrees apart, with an arrow pointing to the tank top.

k. Portable tanks for hydrogen peroxide solution must have a vented closure to prevent accumulation of internal pressure.

l. Portable tanks must always be filled and shipped in the outer steel frame as shown in Rotational Molding, Inc. drawing DOT002-885 on file with the OHMT.

8. SPECIAL PROVISIONS.

a. Shippers may use the packaging covered by this exemption pursuant to 49 CFR 173.22a.

b. Each portable tank must be plainly marked on both sides near the middle, in letters at least two inches high on a contrasting background, "DOT-E 9503".

c. Shipments by rail must be in compliance with the requirements of 49 CFR 174.63(a) and (c).

9. REPORTING REQUIREMENTS. Any incident involving loss of contents of the package must be reported to the OHMT as soon as practicable.

10. EXPIRATION DATE. November 30, 1987.

Issued at Washington, D.C.

  
Alan I. Roberts

Director

Office of Hazardous Materials Transportation

JAN 6 1986

\_\_\_\_\_  
(DATE)

Address all inquiries to: Director, Office of Hazardous Materials Transportation, Research and Special Programs Administration, U.S. Department of Transportation, Washington, D.C., 20590. Attention: Exemptions Branch.

Dist: FHWA, FRA



8. Section 25190, California Health and Safety Code; Section 66374(a), Title 22, California Code of Regulations; Part II 6(k)(2) of the Hazardous Waste Facility Permit:

Bay Area Environmental failed to submit a written report to the Department of Health Services on the release of nitric acid and fumes on 20 July, 1987, within 5 days of the occurrence of the incident.

<b>ICF</b>	<b>TECHNOLOGY</b>
<b>DOCUMENT SOURCE</b>	
DOHS _____	RWQCB _____
OTHER <input checked="" type="checkbox"/> _____	DATE _____

## 8. RESPONSE

1. Ms. Judy Trany, Department of Health Services was verbally notified at 6:45 am on July 21, 1987 within 12 hours of the incident.
2. Mr. Mark Cameron and Mr. Daniel F. Murphy, Department of Health Services were notified approximately 9:00 am on July 21, 1987 within 18 hours of the incident.
3. Mr. Jim McCammon, Department of Health Services participated at a special meeting on November 5, 1987 to discuss the incident and follow up response actions that were taken.

Please find enclosed:

1. Memo from Bob Sisneros, General Manager dated July 20, 1987.
2. Memorandum from Sergeant D. Mussetter dated July 21, 1987.
3. Minutes of special meeting held November 5, 1987.
4. Manifest Document Number 87005896 documenting spill clean-up material transported on July 21 and disposal of on July 23, 1987.
5. Letter from Industrial Claims Service dated September 16, 1987.
6. Memo from John Tillman, Technical Director dated August 31, 1987.
7. Analytical Report from Brown & Caldwell Laboratories dated August 4, 1987.
8. Memo from John Tillman, Technical Director dated August 24, 1987.
9. Analytical Report dated August 4, 1987.
10. Manifest Document Number 87041670 dated August 13, 1987 documenting spill cleanup material transported on August 13, 1987 and received for disposal on August 14, 1987.
11. Memo from John Tillman dated August 3, 1987.
12. Memo dated August 6, 1987 from Hossain Kazemi, Regional Water Quality Control Board.

8. RESPONSE (continued)

13. Letter from Robert Sisneros dated September 28, 1987 to R.W.C.Q.B.
14. Letter from Robert Sisneros dated October 13, 1987 to R.W.C.Q.B.
15. DOT-E9503 granting an exemption on the polyethylene portable tank.
16. Various photos of the spill and cleanup procedure.
17. Paving contract dated September 8, 1987 for installation of 3" A.C. plus an asphalt berm.



**BAY AREA  
ENVIRONMENTAL**

MEMO FROM: Bob Sisneros, General Manager

SUBJECT: Acid spill on July 20, 1987 at the Bay Area Environmental Site.

July 20, 1987

- 7:00 pm: Called by Jesus Magana, President of Bay Area Environmental and told of possible chemical spill at the facility.
- 7:30 pm: Arrived on scene. The following observations were made. One of the four poly tanks that had been filled the same day, which contained a combination of sulfuric, nitric and hydrochloric acids, was empty. A second one was leaking and the third and fourth tanks were swollen and appeared that they might rupture. A yellowish cloud was present.
- 7:45 pm: Checked manifest report to determine content of tanks. Determined to be acids brought to facility by Rollins Environmental. I then called Rollins to confirm the specific nature of the acid and the quantity.
- 8:00 pm: Spoke to Jim Wells, the project manager for Rollins, told him of the problem and requested he respond with clean-up crews.
- 8:10 pm: Spoke to Bruce Benike of the Contra Costa County Environmental Health and told him of problem.
- 8:15 pm: Third tank ruptured and started spilling acid on ground.
- 8:30 pm: Terry Wells, an employee of Bay Area Environmental, assisted me in inspecting the facility perimeter, to insure that there would be no off site contamination.
- 9:15 pm: Clean-up crews began to arrive from Bay Area Environmental and Rollins Environmental. Plans were discussed as how the clean up would proceed. At this time the fourth tank appeared to be leaking.
- 10:30 pm: Tanks were still off-gasing. Bruce Benike from Contra Costa County Health Department was on-site making assessment.
- 11:15 pm: Crews began spreading soda ash on acid to neutralize. Only tank #4 had any material remaining. Crews worked through the night to effect clean up and containment. John Tillman, Bay Area Environmental's Technical Director and chemist, took samples of the spilled material to determine the strength and acidity of the material.
- 2:00 am: I left the site with the crews still neutralizing the acid.



**BAY AREA  
ENVIRONMENTAL**

July 21, 1987

- 6:15 am: Arrived back on site, assessed the clean-up actions that had taken place during the night.
- 6:45 am: Began notifying appropriate governmental agencies. Office of Emergency Services: spoke with Charles O'Neal. Department of Health Services: spoke to Judy Trany. Bay Area Air Quality Management Board: left message on answering service, Mr. Cortez. Also spoke to Numbel Reichling at 9:00 a.m. Our attorney, John Gioia, spoke with Mark Cameron and Daniel F. Murphy of the California Department of Health Services, and representatives of the EPA and Department of Transportation.
- 8:30 am: Began to add additional 3000 lbs. of lime and soda ash to neutralize puddles of acid.
- 9:00 am: Called C.R.W.Q.C.B. and spoke to Hossain Kazemi who said he would come out.
- 9:30 am: Clean up continuing.
- 2:00 pm: Began to dig up dirt and load into roll-off boxes, end dumps. Removed about 50 yards.
- 3:15 pm: Hossain Kazemi of R.W.Q.C.B. arrived to assess situation, gave recommendations, and left.
- 3:45 pm: Don McClanahan of Richmond Fire Department arrived to view situation.
- 4:00 pm: Bruce Benike of C.C.C. Health arrived reviewed progress of clean-up, said he would return 7-22-87.
- 5:00 pm: Two truckload of contaminated soil transported to Class 1 disposal site.
- 6:30 pm: Clean-up completed, site secured.

July 22, 1987

- 8:00 am: Technical Director John Tillman drew numerous samples from the spill area to determine if any further contaminated soil still remains.

Tests are currently being conducted on the soil samples by Bay Area Environmental's on-site chemical lab to determine if there is any remaining contaminated soil. If so, the soil will be excavated and taken to a Class 1 Disposal site.

Memorandum: July 21, 1987  
Police Department



TO: A/Captain D. Seiberling *D-*  
A/Lieutenant D. Berry *DB*

From: A/Sergeant D. Mussetter *DM*

Subject: Hazardous Chemical Leak at 1125 Hensley Avenue - Bay Area Environmental

Synopsis:

On 20Jul87, at 1820 Hours, an employee at 1111 Hensley Avenue, reported an explosion occurred at 1125 Hensley Avenue, Bay Area Environmental, a hazardous waste storage-transfer facility. I was first to arrive on scene with R.F.D. The business was closed and the property was secured by a fence and locked gate.

I observed no damage, fire or smoke initially. I received additional information that the explosion was from a chemical drum in the open yard.

R.F.D. cut the lock from the gate to enter because we observed vapor in the form of a small yellow cloud blowing in a N/NE direction from the southwest area in the yard.

I set up a command post upwind from the escaping vapor and directed a unit to respond to Willard/Hensley Avenue from a safe direction to block vehicular and pedestrian traffic from entering the area and being exposed to the fumes. Traffic was blocked at 7th Street/Hensley Avenue and Willard/Hensley.

The fumes were emanating from one or more tanks in the yard. R.F.D. advised that there were no markings on the tanks and they were leaking. The area was quickly secured and owner of the business was called to the scene to identify the material. The owner arrived, Mr. Jesus Magana, and he called in his General Manager, Bob Sisneros.

They could not immediately identify the material. A/Lieutenant Berry had arrived and the Department of Health Services - Environmental Health Division was called to respond to the scene.

The material was subsequently identified as acid that had been brought to the facility by Rollins Environmental Service, Inc. Rollins Environmental Service responded to the scene to clean up the spillage. Upon the arrival of the Health Services personnel and Rollins Environmental personnel, it was found that the material was 30% Hydrochloric Acid, 30% Nitric Acid, 30% Sulfuric Acid and 10% Water. The acid was harmful, only if breathed in strong concentrations and very dangerous to touch or handle without proper protective gear.

The wind was blowing hard and Mr. Benike of Environmental Health advised no evacuation was needed. The Department of Health Services personnel were supervising the clean-up operation by Rollins Environmental Service, Inc. Bruce Benike of Health Services advised that three of the four tanks had ruptured from pressure within the tanks causing the acid leak onto the ground, causing a vapor cloud. Mr. Bob Sisneros and Mr. James Wells reported that Rollins Environmental Service transported approximately 900 gallons of the acid to Bay Area Environmental approximately one week ago, stored in 55 gallon drums.

Today, Rollins Environmental personnel brought four new 300 gallon poly-tanks to Bay Area Environmental Service. They transferred the acid from the 55 gallon drums into the four 300 gallon poly-tanks. The tanks are a newly developed tank and are Department of Transportation approved for acid. The four poly-tanks were to be transported tomorrow for disposal.

Mr. Hanson of Rollins Environmental Service said the acid also contained trace amounts of copper. Mr. Hanson and Mr. Benike theorize that either the copper caused the acids to react in the tanks causing high pressure to build up and burst the tanks or the capabilities of the tanks were misrepresented by their manufacturers. The tanks did not explode, but burst due to pressure.

Rollins personnel were going to use soda ash on the acid to neutralize it and relieve the pressure on the remaining tank that was about to burst. Rollins personnel estimated that approximately 600 gallons had leaked out of the three ruptured tanks.

Mr. Benike of the Environmental Health Services said that after the acid has been neutralized and the pressure from the fourth tank had been relieved, the road could be opened because there would be no health threat or danger.

Mr. Benike said he was leaving the scene after the acid was neutralized. He said the clean up would occur tomorrow. He said there were no violations of the law.

Officer Thompson took three photographs of the leak with Pentax Camera #34, envelope 000072.

Agencies and Personnel:

RPD

A/Lieutenant Berry  
A/Sergeant Mussetter  
Officer Goldberg  
Officer M. Brooks  
Officer Dixon  
Officer Maday  
Officer Thompson

RFD Fire Fighters

Bruce Benike - Department of Health Services  
1111 Ward Street, Martinez 372-2286

Roger Lewis - Department of Health Services

Jesus J. Magana - Owner of Bay Area Environmental  
1125 Hensley Avenue, 233-8001

R. J. Sisneros - General Manager, Bay Area Environmental

John Tillman - Bay Area Environmental

Terry Wells - Bay Area Environmental

Doug Hanson - Rollins Environmental Services, Inc.  
2305 Paragon Drive, San Jose, 408/435-8580

James T. Wells - Rollins Environmental Services

Mark Parquette, Chemist - Rollins Environmental Services

Chronological Order of Events:

1820 Hours -	Arrived and set up a Command Post - Sanford/Kelsey intersection blocked by Y5.
1834 Hours -	Leo/Willard Avenue traffic blocked by W4.
1840 Hours -	Hensley Avenue South of Willard Avenue blocked by W4 and Y5.
1844 Hours -	Advised 10 minute ETA of the business owner. R.F.D. cannot identify the material.
1848 Hours -	Business owner arrives, Jesus Magana.
1851 Hours -	Jesus Magana enters building and telephones staff.



1857 Hours - Identify leak coming from one or more of four containers. Containers are swelling and appear to be going to rupture.

1907 Hours - Office of Emergency Services called - They will call back in 15 minutes.

1915 Hours - Reporter Carrie Hamell of the West County Times arrives.

1919 Hours - Wind changes direction to the N/E(est.).

1921 Hours - Bob Sisnero's arrives and goes to business to check inventory papers to identify the material.

1936 Hours - Office of Emergency Services call A/Lieutenant Berry at the Command Post. A/Lieutenant Berry is advised to call Bruce Benike at the Department of Health Services. O.E.S. not responding.

1939 Hours - Considering evacuating some homes on Sanford Avenue and Willard Avenue, but wind now blowing more easterly.

1940 Hours - Bob Sisneros advised that the material is acid - 30% Sulfuric, 30% Hydrochloric, 30% Nitric and 10% Water.

A/Lieutenant Berry telephoned Bruce Benike.

1944 Hours - Y5 and W4 advised that the vapor is not blowing toward Willard Avenue and Sanford Avenue.

1955 Hours - A/Lieutenant Berry advised by Bruce Benike that a secure area of 1 to 1-1/2 blocks around the leak are sufficient. It is harmful to breath for prolonged periods and it is very dangerous to be near or touch without proper protective gear.

Advised that Rollins Environmental is responding from San Jose for the clean up; to be supervised by Bruce Benike and Roger Lewis.

2005 Hours - Terry Wells and Doug Hanson of Rollins arrive. R.F.D. moves to 7th Street/Essex.

2014 Hours - Barricades from Corp. Yard are ordered.

2019 Hours - Wind shifts to north direction.

2035 Hours - Evidence Technician Thompson takes photographs of scene.

2051 Hours - Roger Lewis - D.H.S. arrives. Mark Parquette and Jim Wells arrive.

2100 Hours - Barricades for street arrives.

2119 Hours - Bruce Benike arrives.

2141 Hours - Owner - Jesus Magana leaves scene.

2200 Hours - Benike and Lewis examine tanks and advise that three tanks are ruptured and 600 gallons of acid are spilled. There are no violations.

2217-2227 Hours - Truck and crew from Rollins arrive for clean up operation.

0115 Hours - The scene is stabilized and there is no longer any health threat.

All police personnel are relieved of their post.

DM/bas

cc: Lieutenant R. Becker



**BAY AREA  
ENVIRONMENTAL**

SPECIAL MEETING

November 5, 1987

The purpose of the special meeting was to provide various state and local agencies, as well as BAE management, the opportunity to voice concerns and to discuss procedures followed during the period of time immediately following the July 20, 1987 incident which took place at the J.J. Magana/BAE facility.

The meeting convened at 9:00 a.m. at the BAE facility and was continued at 11:00 a.m. at the fire station located near BAE, on the corner of 7th and Hensley Streets in Richmond, California. Mr. David L. Wise, Senior Emergency Planning Coordinator for the Contra Costa County Office of Emergency Services acted as moderator for the meeting. Also in attendance were, from Bay Area Environmental, Mr. Robert Sisneros and Mr. Robert Neal; from the Contra Costa County Department of Health Services, Mr. Jerry Pando, and Mr. Bruce Benike; from the California Department of Health Services, Mr. Jim McCammon; Fire Inspector Don McClanahan and other members of the Richmond Fire and Police Departments.

Copies of a Richmond P.D. inner office memorandum dated July 21, 1987 were issued to those present today (see attached). This memorandum was a synopsis of the events which took place regarding the July 20, 1987 incident and was the outline used for this meeting.

Topics covered included the notification process and responsibility, scene isolation, product identification, response, media involvement and recovery and clean up.

Concern was voiced by one employee of the fire department that the identification of the chemicals involved was not immediate. He stated that a plot plan was not available and that there was some difficulty in locating the correct manifest.

In response, Mr. Sisneros stated that once he was able to view the scene an immediate and accurate identification was in fact given. He said that an inaccurate description of chemicals involved could be catastrophic and stressed the importance of an accurate identification. His statements were verified by Mr. Benike of the Contra Costa County Department of Health Services who stated that a simple action such as spraying the area with water would have worsened the situation.



**BAY AREA  
ENVIRONMENTAL**

Mr. Benike acknowledged that a manifest does not always provide all required information and should not be solely relied upon in an emergency situation. It was noted that BAE does currently have a business plan and a plot plan and will insure that key agencies have access to the plans in an emergency situation.

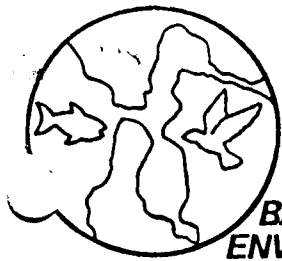
Mr. Wise noted that the notification process must be streamlined by the responsible agencies and Mr. McClanahan noted that efforts are under way to make the dispatching process more efficient.

Mr. Neal suggested that a key contact be available at 911 dispatch for relaying information to be used should an emergency occur. Mr. McClanahan agreed that such advance planning is necessary and took responsibility for designing and implementing this procedure.

Mr. McClanahan noted that there was a need for cellular telephones in vehicles that are used to respond to emergency situations in order to insure that various agencies can be notified within the time frames required by law. He said depending on the location of the emergency and the air quality and wind direction, there may be no telephone access.

Mr. Wise asked representatives of the fire department if they felt they had adequate clothing and protection when dealing with this type of emergency. One gentleman responded that at the present time the fire department was not trained to use the type of special protective gear worn by hazardous waste specialists. Mr. Benike added that the SCBA suits currently in use by fire department employees offers adequate protection.

Mr. Benike said that the the basic function of his department is to take samples. Many feel, incorrectly, that the burden lies with C.C.C. DOHS however they are not equipped to handle large leaks without the assistance of a specialist (usually the manufacturer of the product involved). They are however prepared and willing to deal with small leaks if necessary. This was in response to Mr. McClanahan who asked what agencies should be contacted first. Mr. Benike also said that there are no rules to follow which will govern every emergency situation.



Mr. Pando emphasized that under AB 2185 the OES should be notified within one (1) hour of an emergency by calling the 800 OES telephone number.

Media involvement was also discussed. Mr. Wise suggested that a Public Information Officer be available to the media and that only that officer have the authority to release information to the press. It was agreed that this would be a beneficial policy for all businesses and organizations.

Mr. Sisneros was asked to outline the procedures followed with reference to recovery and clean up during the July 20, 1987 incident. He listed the agencies contacted as well as the steps taken to neutralize and clean the contaminated area.

Mr. Pando asked which department or organization makes the determination that contaminated soil has been rendered clean enough or "safe". Mr Sisneros answered that determination comes from the Regional Water Quality Control Board. He added that BAE has received notification from the Regional Water Quality Board that it is satisfied with the BAE facility concerning this incident.

Mr. McCammon questioned the location of the drums on the date in question. Mr. Sisneros replied that the location may have directly reduced the severity of the situation. Mr. McCammon then asked why the generator of the waste had been allowed to work in the BAE facility transferring the waste material from drums to DOT containers. Mr. Sisneros responded that procedure has now been changed and waste generators are no longer permitted to work in the facility.

Mr. Benike stated that in this particular situation, the hazardous material was contained in the original barrells for 10-12 days without incident. The problem arose after the transfer of the material to DOT approved containers. this was verified by Mr. Sisneros.

It was also noted that the BAE facility lock had to be cut off on July 20 in order to gain access to the facility. It was suggested that perhaps all dump sites should have easier access for key emergency response teams.

Mr. Wise said that efforts will be under way to introduce a more streamlined method for handling emergency situations. He thanked all present for their attendance and contributions. The meeting was adjourned at 1:30 p.m.

# UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address  
 BAY AREA ENVIRONMENTAL  
 1125 HENSLY  
 RICHMOND, CA 94804  
 4. Generator's Phone (415) 233-8001

A. State Manifest Document Number  
 87305896

B. State Generator's ID

CA 170181001140719

5. Transporter 1 Company Name

6. US EPA ID Number

STEVES TRUCKING MATERIALS INC. ID 0635470796

C. State Transporter's ID

80160/80159

D. Transporter's Phone

(408) 263-1176

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

10. US EPA ID Number

CHEMICAL WASTE MANAGEMENT INC.  
 35251 OLD SKYLINE RD.  
 KETTLEMAN CITY, CA 93239

G. State Facility's ID

CA 170100064161117

H. Facility's Phone

(209) 386-9711

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers  
 No. Type

13. Total Quantity

14. Unit  
 Wt/Vol

15. Waste No.

a. HAZARDOUS WASTE, SOLID, N.O.S., ORM-F NA 9189

0012 CM 01010210 Y

State  
 611

EPA/Other  
 N/R

b.

State

EPA/Other

c.

State

EPA/Other

d.

State

EPA/Other

J. Additional Descriptions for Materials Listed Above

acid spill clean-up - neutralized/caustic  
 SOLID

K. Handling Codes for Wastes Listed Above

a. 03

b.

c.

d.

15. Special Handling Instructions and Additional Information

CAUTION: USE PROPER SAFETY GEAR, RUBBER GLOVES + SAFETY GLASSES.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name  
 DAVID BURTON

Signature  
 David Burton

Month Day Year  
 11/21/87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name  
 Bill Adams

Signature  
 Bill Adams

Month Day Year  
 11/21/87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Rem 19.

Printed/Typed Name  
 Danny G. Domingo

Signature  
 Danny G. Domingo

Month Day Year  
 11/21/87



## INDUSTRIAL CLAIMS SERVICE

SAN FRANCISCO EAST BAY OFFICE  
2000 CALIFORNIA WAY, SUITE 220  
OAKLAND, CALIFORNIA 94663  
(415) 254-8930

September 16, 1987

United States Department of Transportation  
400 Seventh Street SW  
Washington, D.C. 20590

ATTN: Jennifer Jones

DHM - 41.2

RE: Claim No.: 1B-4339  
Insured: Rollins Environmental Services, Inc.  
Date of Loss: 7-20-87  
Loss Location: Bay Area Environmental  
Richmond, California

Dear Ms. Jones:

When we spoke on August 27, 1987, you requested copies of the chemical analysis tests which were done by both B.A.E. and R.E.S.. I have finally received these reports and am attaching copies for you.

Additionally, I spoke with Bob Sisneros on September 10, 1987, and requested that he send you samples of each of the tanks which you inspected. He promised to do this, and I hope that you have received the samples by now.

As you may suspect, we are all anxiously awaiting a copy of your report, especially since outstanding bills need to be paid. Please be good enough to see that all of us receive a copy of your report as soon as possible.

If there is anything else I can do, please do not hesitate to call.

Best regards,

Jo Gelinas  
Adjuster

JG:cs



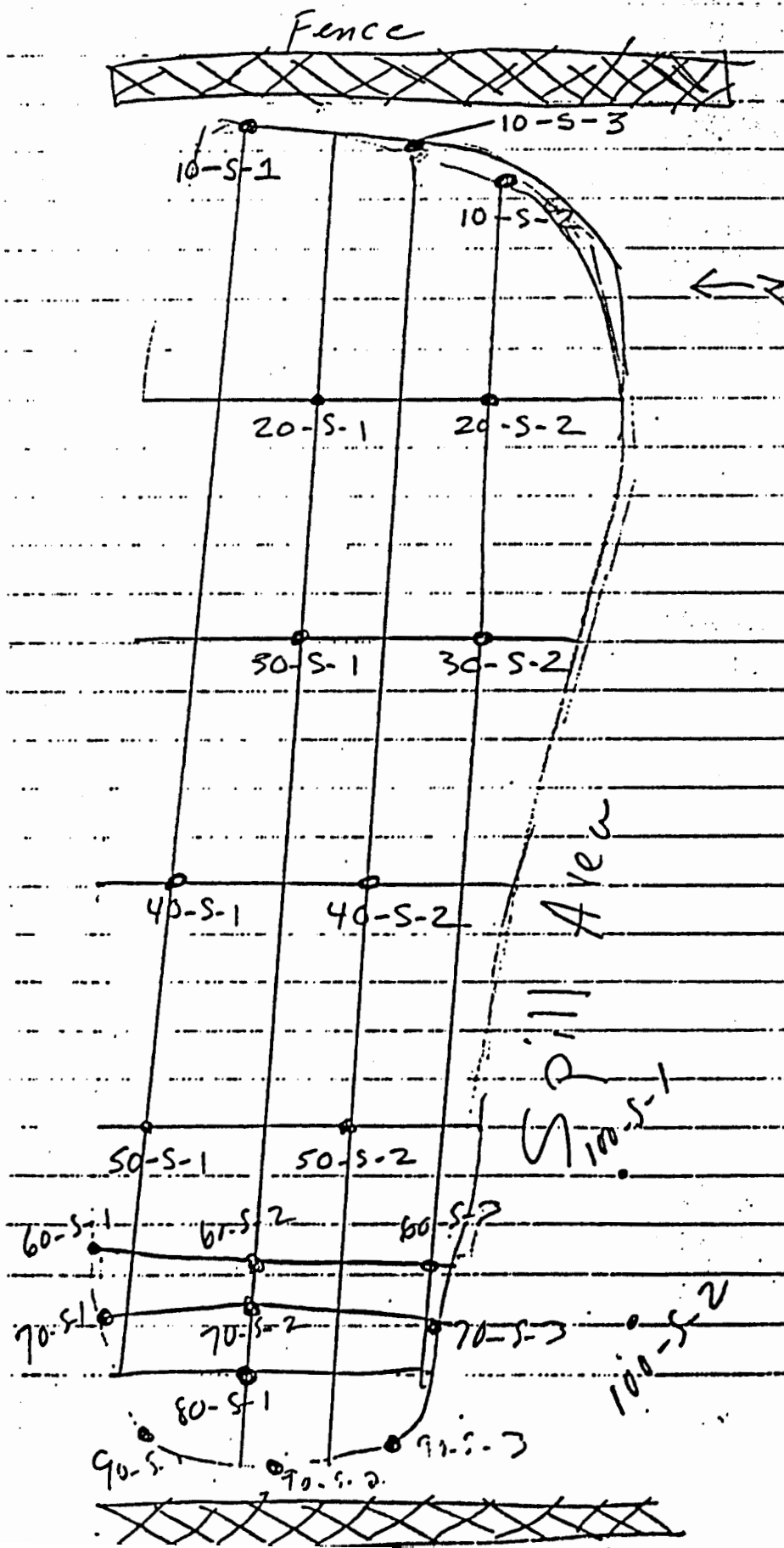
U.S. Dept. of Transportation  
September 16, 1987  
Page Two

cc: R.E.S.  
P.O. Box 1791  
Wilmington, Delaware 19899

ATTN: Lynn Poad

Bay Area Environmental  
1125 Hensley Street  
Richmond, CA 94804

ATTN: Bob Sisneros







**BAY AREA  
ENVIRONMENTAL**

August 31, 1987

TO: Bob Sisneros, General Manager  
FROM: John Tillman, Technical Director *JT*  
SUBJECT: Summary of data relevant to Rollins Acid Spill at BAE Facility

The following is the compilation of data obtained from all samples taken at our facility during and after the acid spill. The data indicates that the pH of the soil taken from the spill area is within the units of 6 to 9.

August 3, 1987

1. Sample taken from one of the tanks involved in the spill; CAM Analysis by Brown & Cadwell.

Constituent	Concentration {Mg/Kg}
Silver (Ag)	.2
Berilium (Be)	<.02
Cadmium (Cd)	7
Tin (Sn)	<8
Barium (Ba)	.64
Thalium (Ta)	<.5
*Chromium (Cr)	190
Molybdelnum (Mo)	6
Lead (Pb)	17
Copper (Cu)	320
*Nickel (Ni)	24,000
Zinc (Zn)	120
Cobalt (Co)	59
Vanadium (Va)	1.2
Arsenic (As)	<.3
Selenium (Se)	<.4
Mercury (Hg)	2.8

\*The DOHS has set limits for Cr at 560 mg/kg and Ni at 2000 mg/kg.

The following liquid samples were taken from the ground during the spillage. Five (5) samples were taken from liquid pools in the yard. BAE-001 was closest to the spill site and BAE-005 was furthest from the spill site.

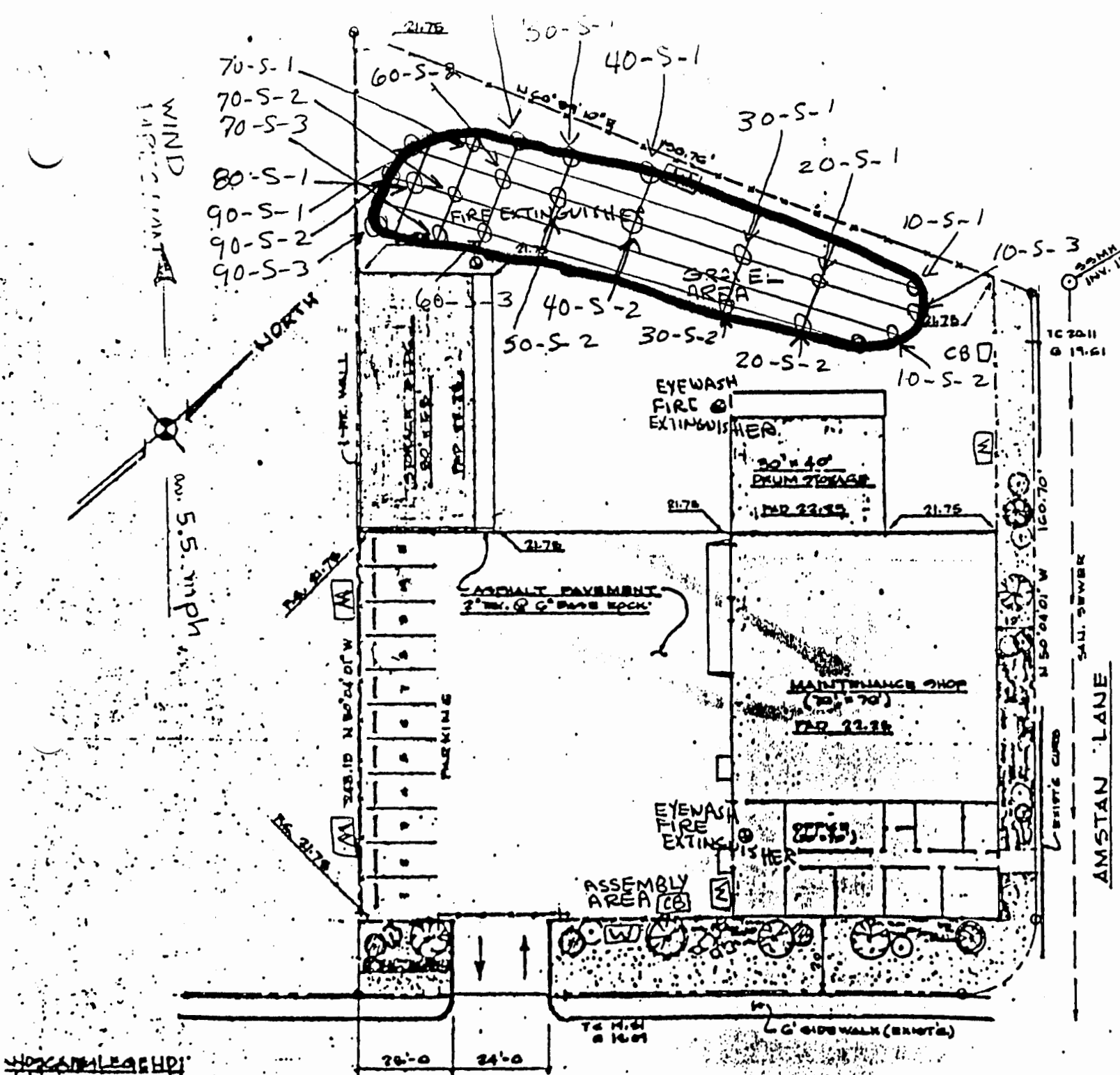
<u>Sample I.D.</u>	<u>Parameter</u>			
		(mg/kg)	(Normality)	
	Cr	Ni	Acidity	pH
BAE-001	150	37000		
BAE-002	160	24000		
BAE-003	130	31000		
BAE-004	120	34000		
BAE-005	120	29000	6.92	0.8

The following soil samples were taken and the pH determined the day after the spill occurred at 6 and 12 inch depths. The samples were taken at 10 feet intervals throughout the effected area. (Please see sampling plan diagram).

<u>Sample I.D.</u>	<u>pH at 6"</u>	<u>pH at 12"</u>
10-S-1	6.6	6.9
10-S-2	6.7	7.0
20-S-1	7.4	7.3
20-S-2	7.0	7.8
30-S-1	7.1	7.6
30-S-2	8.2	8.0
40-S-1	4.4	7.7
40-S-2	5.2	7.8
50-S-1	8.2	8.0
50-S-2	8.7	
60-S-1	7.3	
60-S-2	9.0	
60-S-3	8.7	
70-S-1	6.4	
70-S-2	6.5	
70-S-3	6.7	
80-S-1	8.9	7.6
90-S-1	7.5	6.7
90-S-2	4.8	6.4
90-S-3	7.0	6.4
100-S-1		3.5
100-S-2		3.7

Check samples were taken and analyzed by Brown & Cadwell Laboratories at 6 and 12 inch depths for chromium, nickle, and acidity.

<u>Sample I.D.</u>	<u>Parameter</u>		
	Cr (mg/kg)	Ni (mg/kg)	Acidity (N)
70-S-2 (6")	30	5.4	0.005
80-S-1 (6")	17	3.5	0
100-S-1 (12")	31	41.0	0.103
100-S-2 (12")	36	74.0	0.247



- CHAIN LINK FENCE  
 GARDENIA TREE  
 FIRETHORN TREE  
 GLOSSY MUELLERIA  
 CROTON TREE  
 CARMEL CUIVETOR  
 GROUND COVER  
 TRAILING GUAHA  
 GROUND COVER

HENSLEY STREET

# SITE PLAN 1" = 20'

J.
MADE BY
DATE
SH
VICINN



## BROWN AND CALDWELL LABORATORIES

1255 POWELL STREET EMERYVILLE, CA 94608 • (415) 428-2300

## ANALYTICAL REPORT

LOG NO: E87-07-425

Received: 23 JUL 87

Reported: 04 AUG 87

Mr. John Tillman  
Bay Area Environmental  
1125 Hensley Street  
Richmond, California 94804

Project: 7-00199-87

## REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION, SOIL SAMPLES	DATE SAMPLED			
07-425-1	70-5-2(6")	21 JUL 87			
07-425-2	80-5-1(6")	21 JUL 87			
07-425-3	100-5-1(12")	21 JUL 87			
07-425-4	100-5-2(12")	21 JUL 87			
PARAMETER	07-425-1	07-425-2	07-425-3	07-425-4	
Nitric Acid Digestion, Date	07.24.87	07.24.87	07.24.87	07.24.87	
Acidity (as CaCO <sub>3</sub> ), mg/kg	<500	<500	45000	110000	
Chromium, mg/kg	30	17	31	36	
Nickel, mg/kg	54	35	410	740	

The acidity can be converted to normality as follows:

$$(N)(V) = (N)(V) \quad (0.1087)(V) = N(\text{wt},g)$$

$$-1 \quad 0.005$$

$$-2 \quad 0.0$$

$$-3 \quad 0.103$$

$$-4 \quad 0.247$$

D. A. McLean, Laboratory Director



**BAY AREA  
ENVIRONMENTAL**

August 24, 1987

TO: Bob Sisneros, General Manager  
FROM: John Tillman, Technical Director *JH*  
SUBJECT: pH Evaluation of Soil Samples Due to Rollins Spill of  
Acid Solution

*2' ABOVE GRADE*

<u>Sample Number</u>	<u>pH</u>
1	6.85
2	7.10
3	7.20
4	6.95
5	6.65
6	6.60



**BAY AREA  
ENVIRONMENTAL**

TO: Bob Sisneros, General Manager

FROM: John H. Tillman, Technical Director

SUBJECT: Rē-Sampling & Analysis of Soil Samples following Rollins' Acid Spill

Six (6) additional soil samples were taken from the 100 ft. area nearest the left storage shed. The samples were taken at two (2) inch depths as directed by the Water Quality Offices. The results are as follows:

<u>Sample Number</u>	<u>pH</u>
100-S-A1	5.5
100-S-A2	8.3
100-S-A3	9.5
100-S-A4	5.2
100-S-A5	5.2
100-S-A6	2.8

- SYMBOLS:
- ① CHAIN LINK FENCE
  - ② ASPHALT PAVE
  - ③ FIRE HYDRANT
  - ④ ALLOY ALUMINUM
  - ⑤ CASTON TISS
  - ⑥ CASUAL GUARD
  - ⑦ GROUND CARS
  - ⑧ TRAILING CARS
  - ⑨ GROUND CARS

# SITE PLAN

HENSLEY STREET

AMSTAN LANE

W. S.S. mph

NORTH

100-S-A1  
100-S-A2  
100-S-A3  
100-S-A4  
100-S-A5  
100-S-A6

FIRE EXTINGUISHER

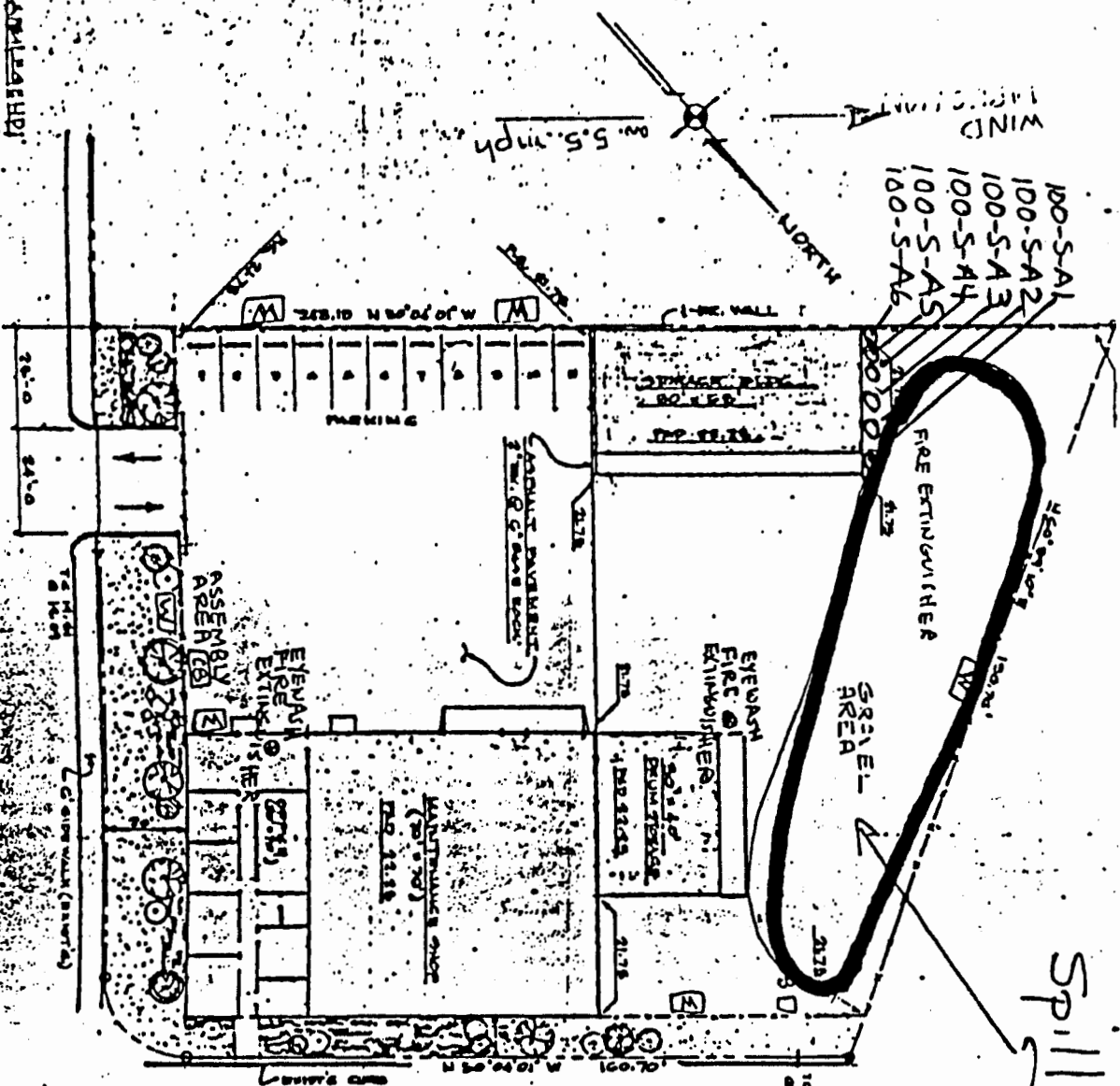
GRAB AREA

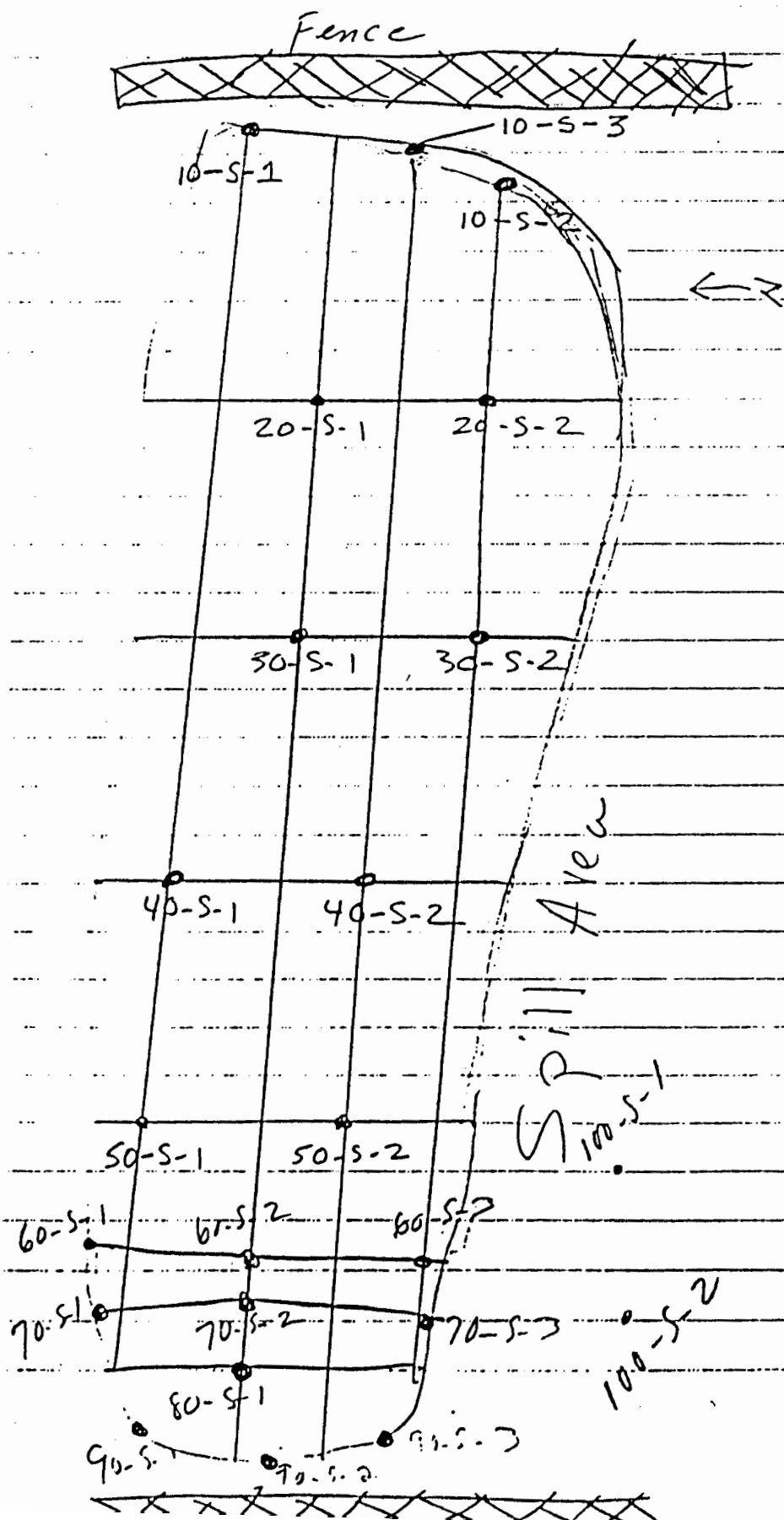
Spill Area

J.J. MAGANA CORP.	
DATE: 8-1-83	PROJECT: SHOP/OFFICE BUILDING
VICINITY MAP: 75 PLAN	



DATE: 8-1-83  
PROJECT: SHOP/OFFICE BUILDING  
VICINITY MAP: 75 PLAN









BAY AREA  
ENVIRONMENTAL

Attached to #  
shipped to CASMATA  
manifest # 87041670  
Drums 54-57  
8/13/87

ANALYTICAL LABORATORY

ANALYSIS REPORT

CLIENT NAME AND ADDRESS

Bay Area Environmental, Inc.  
1125 Hensley Street  
Richmond, CA 94801

LABORATORY SAMPLE NUMBER: 100-S-2 (12")

See B.C. Data

80-S-2 (6")

80-S-1 (6")

100-S-1 (12")

DATE REPORTED: 8-4-87

DATE SUBMITTED: 7-23-87

DISCARD DATE: 9-4-87

P.O. NUMBER: Acid spill

COLLECTED BY: Joe Lynch

ANALYSIS METHOD/CONSTITUENT	CONCENTRATION	DETECTION LIMIT	UNITS
-----------------------------	---------------	-----------------	-------

Acid spill in yard

Total cam metals

Soil contaminated with

nitric acid with nickel soln

neutralize with lime

al pH 10.5 - 12.0

as solid waste

1 COPY TO:

CLIENT NAME

CONTACT PERSON

RESPECTFULLY SUBMITTED  
BAE ANALYTICAL LABORATORY

REVIEWED AND APPROVED BY:

Hazardous Waste Storage-Transfer Facility  
1125 HENSLEY ST. RICHMOND, CA 94801  
(415) 233-8001

## Operator's US EIA ID No.

123, 2001b, 2001c, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 2

Page  
of

information in the shaded areas  
is not required by Federal law.

3. Generator's Name and Mailing Address Cassalia Environmental 170 Wansley Street, Richmond, VA 23261						A. State Manifest Document Number  0-9-2-1-0															
4. Generator's Phone ( ) 						B. State Generator's ID HIAHQERQJANUEA															
5. Transporter 1 Company Name Paul's Barrel Company						6. US EPA ID Number CA1010101131						C. State Transporter's ID 80170									
7. Transporter 2 Company Name 						8. US EPA ID Number 						D. Transporter's Phone 415-238-7175									
9. Designated Facility Name and Site Address Casualty Resources NIB Road Casalita, CA 95725						10. US EPA ID Number CAIDU0210114R1K6						E. State Transporter's ID 									
												F. Transporter's Phone 									
												G. State Facility's ID ICAD02107481125									
												H. Facility's Phone 805-937-3445									
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No.		Type	13. Total Quantity		14. Unit Wt/Vol	I. Waste No. State EPA/Other									
a. Hazardous Waste, Solid, R.O.S., Inert, UN #1029 Drums 1-47						0107		DIN	101140		P	State 223/272/451 EPA/Other 000									
b. CORROSIVE MATERIAL UN #1759 Waste Corrosive, Solid, R.O.S., Flammable Gas UN #1954 Drums 48-50						0115		DIN	11140		P	State 511/123 N9 EPA/Other 000									
c. Drums 07-73 Waste Compressed Gas, R.O.S., Flammable, UN #1954						0107		DIN	12140		P	State 512 GIG EPA/Other exempt A									
d. GENERATOR COPY Hazardous Waste, Bquran.Dos.Casalita, CA #5189 Drums 74-79						0110		DIN	1214000		P	State 551 N9 EPA/Other exempt									
J. Additional Descriptions for Materials Listed Above See attached lists & MSDS's all drums stabilized with clay absorbant						K. Handling Codes for Wastes Listed Above a. 03						b. 03	c. 	d. 03							
15. Special Handling Instructions and Additional Information Weak steel food tarts!																					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																					
Printed/Typed Name Joseph Lynch						Signature Joseph C Lynch						Month Day Year 01/11/3812									
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name John J. Dickson						Signature John J. Dickson						Month Day Year 08/13/87									
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name 						Signature 						Month Day Year 									
19. Discrepancy Indication Space Item ( REFUSED) CONTENTS INCOMPATIBLE WITH TARE																					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Casalita Resources # 94888 - ab.holtz														Signature Annis Fraley Hennes Frazier						Month Day Year 01/11/4812	



BAY AREA  
ENVIRONMENTAL

August 3, 1987

TO: Bob Sisneros, General Manager  
FROM: John Tillman, Technical Director  
SUBJECT: Acid Spill Analytical Results

The following is a compilation of data obtained from samples taken on our facility during the transfer of acids by Rollins Environmental:

1. Sample taken from one of the tanks involved in the spill; CAM Analysis by Brown & Cadwell.

<u>Constituent</u>	<u>Concentration {Mg/Kg}</u>
Silver {Ag}	
Berilium {Be}	
Cadmium {Cd}	
Tin {Sn}	
Barium {Ba}	
Thalium {Ta}	
*Chromium {Cr}	
Molybelem {Mo}	
Lead {Pb}	
Copper {Cu}	
*Nickel {Ni}	
Zinc {Zn}	
Cobalt {Co}	
Vanadium {Va}	
Arsenic {As}	
Selenium {Se}	
Mercury {Hg}	

*Cover letter*

\*The DOHS has set limits for Cr at 500 mg/kg and Ni at 2000 mg/kg.

The following liquid samples were taken from the ground during the spillage. Five {5} samples were taken from liquid pools in the yard. BAE-001 was closest to the spill site and BAE-005 was furthest from the spill site.

Sample I.D.

Parameter  
{mg/e} {Normality}

	Cr	Ni	Acidity	pH
BAE-001	150	37000		
BAE-002	160	34000		
BAE-003	130	31000		
BAE-004	120	34000		
BAE-005	120	29000	6.92	0.8

The following soil samples were taken and the pH determined the day after the spill occurred at 6 and 12 inch depths. The samples were taken at 10 fet intervals throughout the effected area. {Please see sampling plan diagram}.

<u>Sample I.D.</u>	<u>pH at 6"</u>	<u>pH at 12"</u>
10-S-1	6.6	6.9
10-S-2	6.7	7.0
20-S-1	7.4	7.3
20-S-2	7.0	7.8
30-S-1	7.1	7.6
30-S-2	8.2	8.0
40-S-1	4.4	7.7
40-S-2	5.2	7.8
50-S-1	8.2	8.0
50-S-2	8.7	
60-S-1	7.3	
60-S-2	9.0	
60-S-3	8.7	
70-S-1	6.4	
70-S-2	6.5	
70-S-3	6.7	
80-S-1	8.9	7.6
90-S-1	7.5	6.7
90-S-2	4.8	6.4
90-S-3	7.0	6.4
100-S-1		3.5
100-S-2		3.7

Check samples were taken and analyzed by Brown & Cadwell laboratories at 6 and 12 inch depths for chromium, nickle, and acidity.

<u>Sample I.D.</u>	<u>Cr {mg/kg}</u>	<u>Parameter Ni {mg/kg}</u>	<u>Acidity {N}</u>
70-S-2 {6"}	30	5.4	0.005
80-S-1 {6"}	17	3.5	0
100-S-1 {12"}	31	41.0	0.103
100-S-2 {12"}	36	74.0	0.247

The limit set for nickle for this procedure is 20 mg/kg Nl .41 & 74 mg/kg are both above the limit. Follow up samples are ~~being~~ taken to determined if our facility is clean because of the ~~descrepancies~~ as stated.

*SPL*

TRANSMITTAL  
Seq. 1 / Origin

OFFICE MEMO  
SAN FRANCISCO BAY REGION

E	INIT.	ROUTE	INIT.
RBJ		MUNICIPAL	
MAB		TCW*	
LPK		RJC+	
DMH		RL	
GJG		ADF	
		RAD	

PLANNING	
RHW*	
SLA	
DST	
MPC	

INDUSTRIAL	
SRR*	
WKB+	
BHW	
LWT	
LHH	
GRF	
AGL+	
DCB	
KRH	
KJT	
2 <u>MHK</u>	
MDD+	
TEM	
JEC	
LAH	

Geo Support	
TMS	
SNH	
LHG	
CTS	

SAH+	
WT	
SBE	
DAM+	
SRL	
JJ	
BDA	
Pretreatment	
ETH	
PCM	

SO. BAY TOXICS	
SIM*	
FEJ+	
JLH	
DLH	
BAA	
MTW	
RHC	
RKM+	
RWM	
JYL	
SDI	
TJB	
MYM	
JRM	

TOXICS CLEANUP			
DDD*	PWJ+	FXG	
LF+	TC		
RMB	Voc		
TGR	Voc		
WBH	BHW		
	MRK		

SUBJECT: Status of July 20, 1987 spill of acid on the Ground/Chert yard of the Bay Area Env. Permitter (DHS) Storage Transfer facility in Richmond.

BY: MHK DATE: 10/6/87

INFO FROM: Report attached

Bay Area Environmental Co is located in Richmond that handles Hazardous wastes for storage & transfer facility. All the wastes are stored in a EPA approved drum.

On 7/20/87 one of the stored acid tanks ruptured causing acid spill on the ground. The spill was contained. Soil was neutralized by Soda Ash and saturated soil were hauled out to class I site. I inspected the site and found the clean up measures undertaken was satisfactory. No evidence of any white discharge was noted.

After removal of soil additional soil samples were taken to check the pH of the soil. pH at 2 feet was about 6.6.

Conclusion. Clean up was satisfactory and no threat to water quality exist at the site. The Co. would like to asphalt the area so that future spilled could easily be contained and cleaned. Spill was logged & reported to the Board as minor spill.

Recommendation. No further action. May give reason to hold Co.'s proposal to asphalt the storage yard.

Enclosure - 186 - 10/5/87



**BAY AREA  
ENVIRONMENTAL**

September 28, 1987

Mr. Hossain Kazemi  
Regional Water Quality Control Board  
San Francisco Bay Region  
1111 Jackson Street, Room 6040  
Oakland, CA 94607

Dear Mr. Kazemi:

When we spoke on your last visit, you asked that I write you a letter explaining how the clean-up of our acid spill was accomplished.

When you were initially called on our site after the spill (July 21, 1987) you witnessed the clean-up in progress and gave us the sampling plan to determine if clean up was complete.

You then returned August 24, 1987 and asked for additional samples to be taken at 2 foot depths.

When you were here we discussed several facts relating to the spill such as, spill was contained on-site, no off-site contamination, clean up was done immediately and completed within 24 hours from spill. We are also going to asphalt the remaining portion of our yard as soon as you give us the approval in writing. You also stated that it was alright to fill in the area that has been excavated.

Please find attached the following:

1. Sampling plan
2. Site plans
3. Analytical results
4. Copies of Manifest

Also, we are awaiting your report so that we may asphalt our yard. If you have further information or have any questions please feel free to call anytime.

Sincerely,

Robert J. Sisneros  
Bay Area Environmental  
Vice President

RJS/aan



BAY AREA  
ENVIRONMENTAL

October 13, 1987

Mr. M. Hossain Kazemi  
Regional Water Quality Control Board  
San Francisco Bay Region  
1111 Jackson Street, Room 6040  
Oakland, CA 94607

Dear Hossain:

I received a copy of your internal memo concerning our spill clean-up and the concurrence by your supervisor that no further action is necessary. We therefore are going to proceed with the asphaltting of our yard.

I thank you for your help and guidance after our spill, and your timely response in regards to our request to asphalt our yard.

Sincerely,

Robert J. Sisneros  
Vice President  
Bay Area Environmental

RJS/aan

cc: JJM  
RCN



DOT-E 9503

1. Rotational Molding, Inc., Gardena, California, , is hereby granted an exemption from those provisions of this Department's Hazardous Materials Regulations specified in paragraph 5 below to manufacture, mark, and sell the packaging described in paragraph 7 below for use in the transportation of the corrosive materials, flammable liquids or an oxidizer described in paragraph 3 below in commerce subject to the limitations and special requirements specified herein. This exemption authorizes the use of a non-DOT specification rotationally molded, polyethylene portable tank enclosed in a steel frame, for the shipment of corrosive materials, flammable liquids, or an oxidizer, and provides no relief from any regulation other than as specifically stated.

2. BASIS. This exemption is based on Rotational Molding, Inc.'s application dated August 28, 1985, submitted in accordance with 49 CFR 107.103 and the public proceeding thereon.

3. HAZARDOUS MATERIALS (Descriptor and class).

(a) Corrosive liquids for which a DOT-34 reusable polyethylene container is prescribed in 49 CFR Part 173, and which have no secondary hazards and a vapor pressure of no greater than 14.7 psia at 130°F., classed as corrosive material.

(b) Hydrogen peroxide solution in water containing 52 percent or less hydrogen peroxide by weight, classed as an oxidizer.

(c) Isopropyl alcohol, ethyl alcohol, and methyl alcohol classed as flammable liquids; flammable liquids compatible with polyethylene which have no secondary hazards and have a flash point of 73°F. or higher; and other flammable liquids which have been specifically identified to, and acknowledged in writing, by the Office of Hazardous Materials Transportation (OHMT) prior to the first shipment.

4. PROPER SHIPPING NAME (49 CFR 172.101). Specific chemical name or generic description, as appropriate.

5. REGULATION AFFECTED. 49 CFR Part 173, subpart F; 173.119, 173.125, 173.266, 178.19, 178.253.

6. MODES OF TRANSPORTATION AUTHORIZED. Motor vehicle, rail freight.

7. SAFETY CONTROL MEASURES.

a. Packaging prescribed is a non-DOT specification rotationally molded polyethylene portable tank having a nominal water capacity of 300 gallons enclosed in an outer steel frame. The polyethylene portable tank has no bottom outlets and must be as shown on Rotational Molding, Inc. drawings DOT001-885 through DOT004-885 on file with the OHMT. Each tank must be constructed in compliance with 49 CFR 178.19 except as follows:



- i. 178.19-2(a) - Does not apply. Instead, container must be rotationally molded of polyethylene which has been specifically identified to and is acceptable to the OHMT.
- ii. 178.19-3 - Minimum thickness of container must be 0.224 inch.
- iii. 178.19-4 - Does not apply.
- iv. 178.19-6(a) - Does not apply. Instead, each portable tank must be permanently marked by embossment or with a metal certification plate permanently affixed to each tank. The markings must be in letters and numbers at least 1/4-inch high located on the side of the tank. The markings shall be understood to certify that the portable tank complies with all requirements of this exemption and contain at least the following information:  
  
 DOT-E 9503 portable tank  
 Tank Manufacturer \_\_\_\_\_  
 Test pressure 15 psig.  
 Serial number \_\_\_\_\_  
 Date of manufacture \_\_\_\_\_ month/year  
 Tare weight \_\_\_\_\_ lbs.  
 Rated gross weight \_\_\_\_\_ lbs.  
 Capacity \_\_\_\_\_ U.S. gal.
- v. 178.19-7(a)(3) - Changed to read: Each portable tank shall be tested by retaining for 5 minutes, hydrostatic pressure of at least 15 psig at equilibrium without leakage or pressure drop.
- vi. 178.19-7(c)(2) - Does not apply.

b. Each tank must be fitted with a pressure relief device that will limit the pressure in the tank to 15 psig and is in accordance with 49 CFR 178.253-4 except as follows:

## (i) 178.253-4(a)

- Frangible devices are not authorized.

## (ii) 178.253-4(c)(1)

- The pressure relief device must open at not less than 10 psig and not over 15 psig.
- The minimum venting capacity for pressure activated vents must be 6,000 SCFH at not more than 15 pounds per square inch gage.

## (iii) 178.253-4(c)(3)

- A fusible device that will function at a temperature no greater than 250°F may be used provided the vapor pressure in the tank at 250°F does not exceed 15 psig.

c. Portable tanks must be capable of satisfactorily withstanding the drop test and hydrostatic pressure test prescribed in 49 CFR 178.19-7(a), the stacking and lifting device tests prescribed in 49 CFR 178.251-5(a)(2), and the vibration test prescribed in 49 CFR 178.253-5(a)(1).

d. Each portable tank must possess the chemical and physical properties as reported to the OHMT by the petitioner's letter dated August 28, 1985.

e. Any changes in design, resin, or process methods must be approved by the OHMT. Prototype test results for the tests required in paragraph 7.c. of this exemption must accompany any request for changes in design, resin, or process methods.

f. Reuse of any portable tank must be in accordance with the applicable requirements of 49 CFR 173.28 and 173.32(f) as modified herein. Each portable tank must be hydrostatically retested in accordance with 49 CFR 173.32(f) as applicable to DOT Spec. 57 tanks, at a test pressure of 15 psig for 5 minutes without a drop in pressure or leakage. Any tank that fails must be rejected and may not be used again for the transportation of hazardous materials. The date of the most recent periodic retest must be marked near the tank identification markings required in 7, a, iv of this exemption. The owner of the tank or his authorized agent must retain a written record indicating the date and results of all required tests and the name and address of the tester, until the next retest has been satisfactorily completed and recorded.

g. Portable tanks having any portion of their molded body or components repaired are not authorized.

h. Commodities must be compatible with the polyethylene (PE) portable tank, and must not permeate the PE to an extent that a hazardous condition could be caused during transportation and handling.

i. Any fitting used must be protected in accordance with 49 CFR 178.253-3.

j. The sides of each portable tank must be marked "KEEP THIS END UP" in two places, 180 degrees apart, with an arrow pointing to the tank top.

k. Portable tanks for hydrogen peroxide solution must have a vented closure to prevent accumulation of internal pressure.

l. Portable tanks must always be filled and shipped in the outer steel frame as shown in Rotational Molding, Inc. drawing DOT002-885 on file with the OHMT.

8. SPECIAL PROVISIONS.

a. Shippers may use the packaging covered by this exemption pursuant to 49 CFR 173.22a.

b. Each portable tank must be plainly marked on both sides near the middle, in letters at least two inches high on a contrasting background, "DOT-E 9503".

c. Shipments by rail must be in compliance with the requirements of 49 CFR 174.63(a) and (c).

9. REPORTING REQUIREMENTS. Any incident involving loss of contents of the package must be reported to the OHMT as soon as practicable.

10. EXPIRATION DATE. November 30, 1987.

Issued at Washington, D.C.

  
for Alan I. Roberts

Director

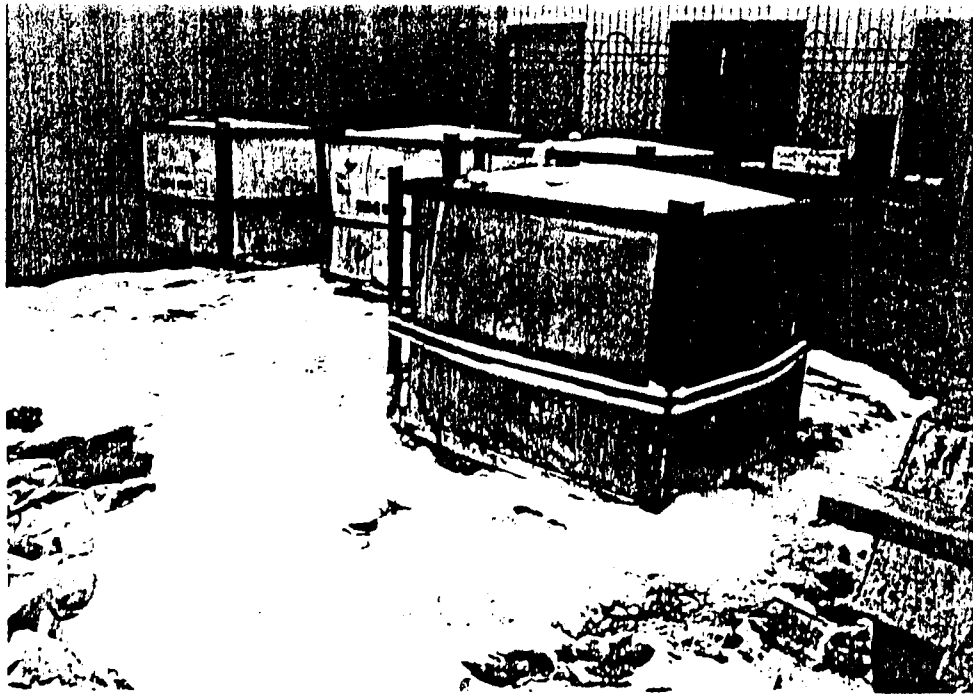
Office of Hazardous Materials Transportation

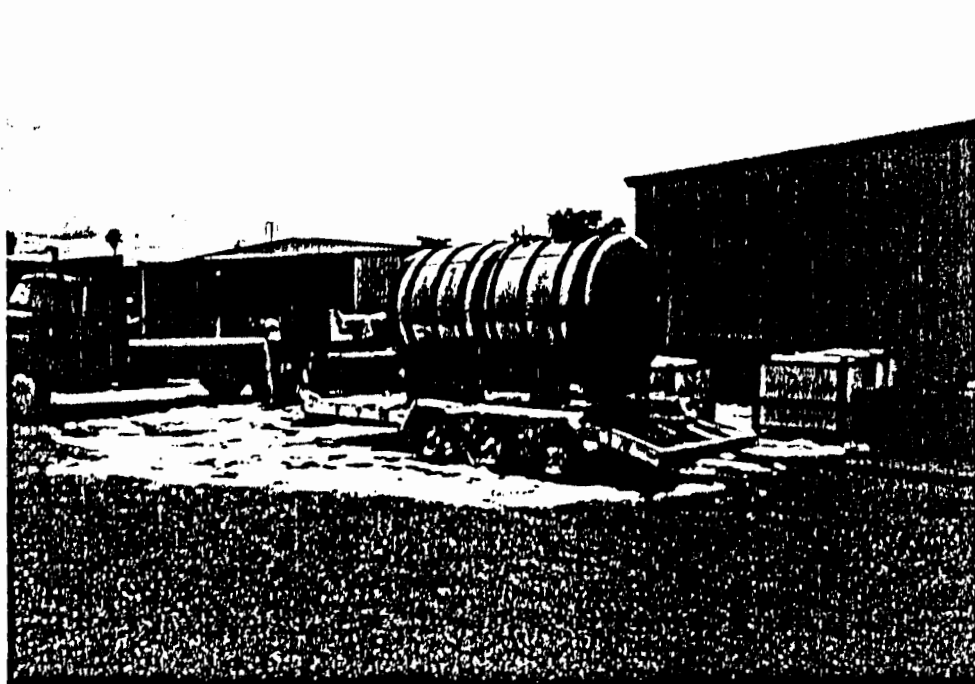
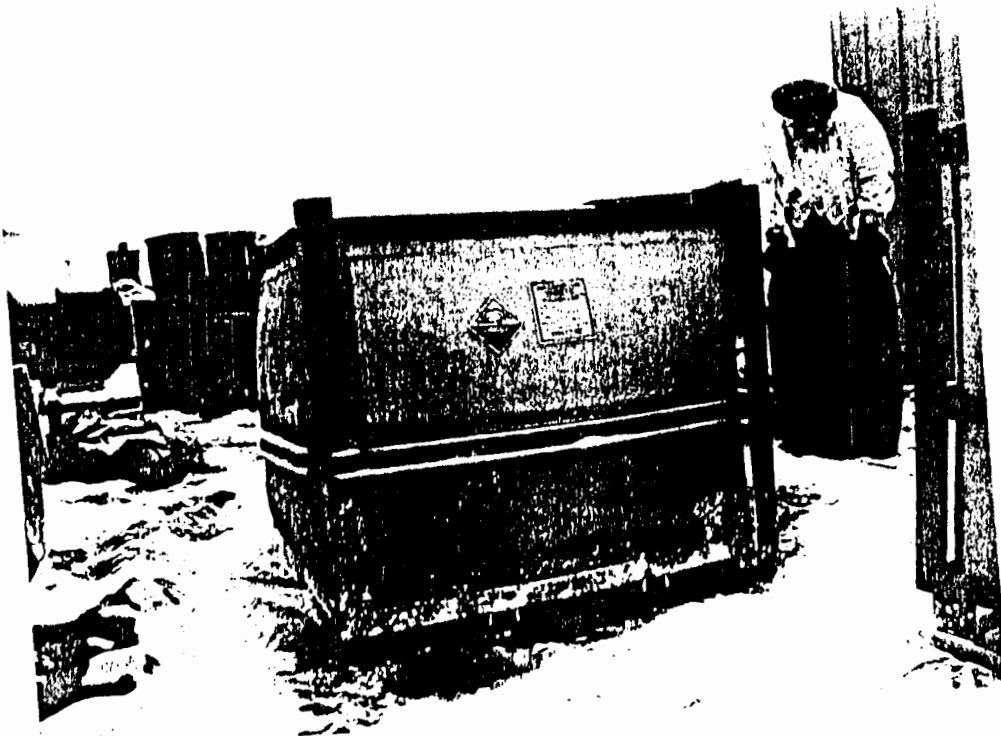
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(DATE)

Address all inquiries to: Director, Office of Hazardous Materials Transportation, Research and Special Programs Administration, U.S. Department of Transportation, Washington, D.C., 20590. Attention: Exemptions Branch.

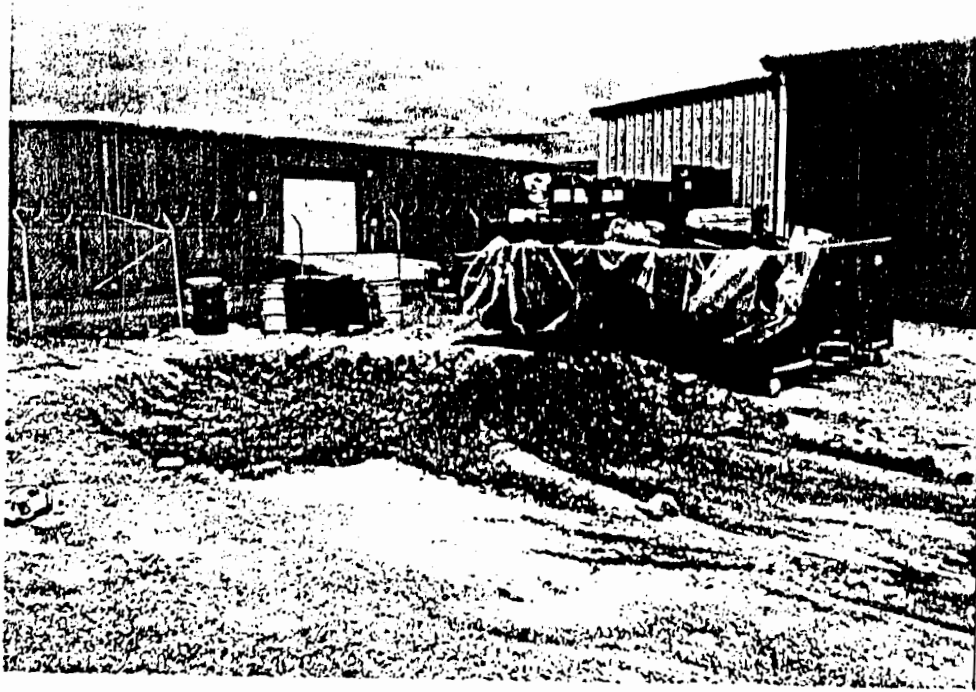
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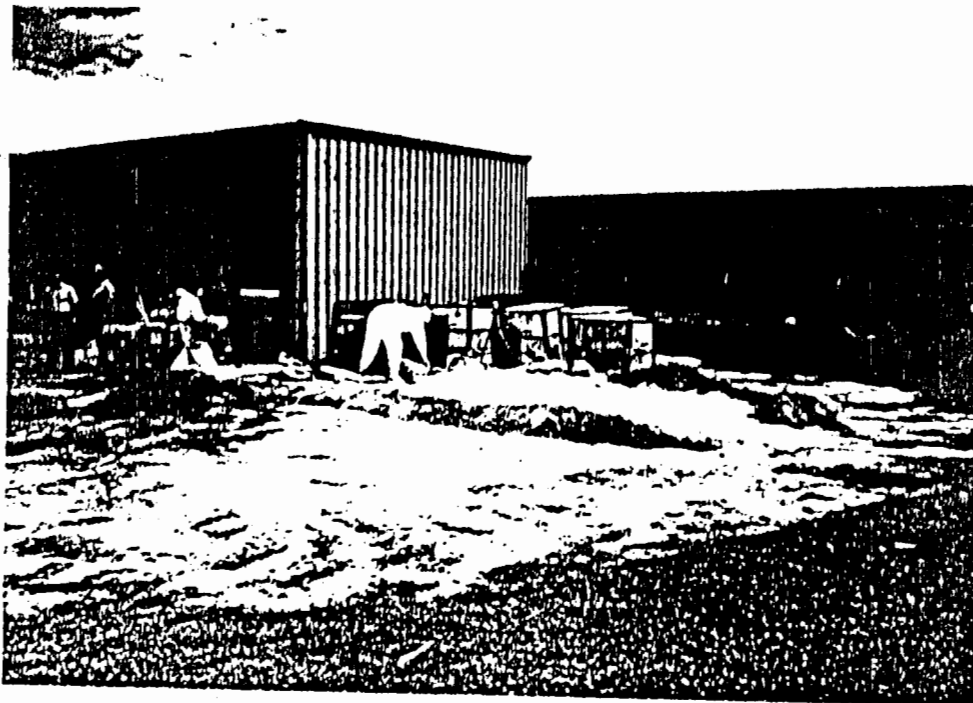




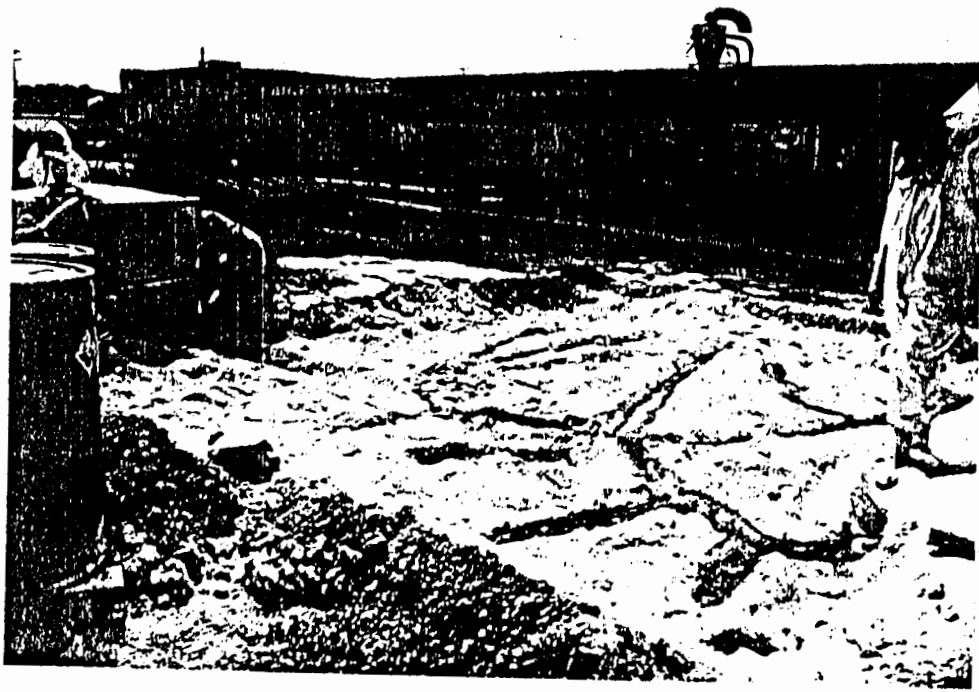




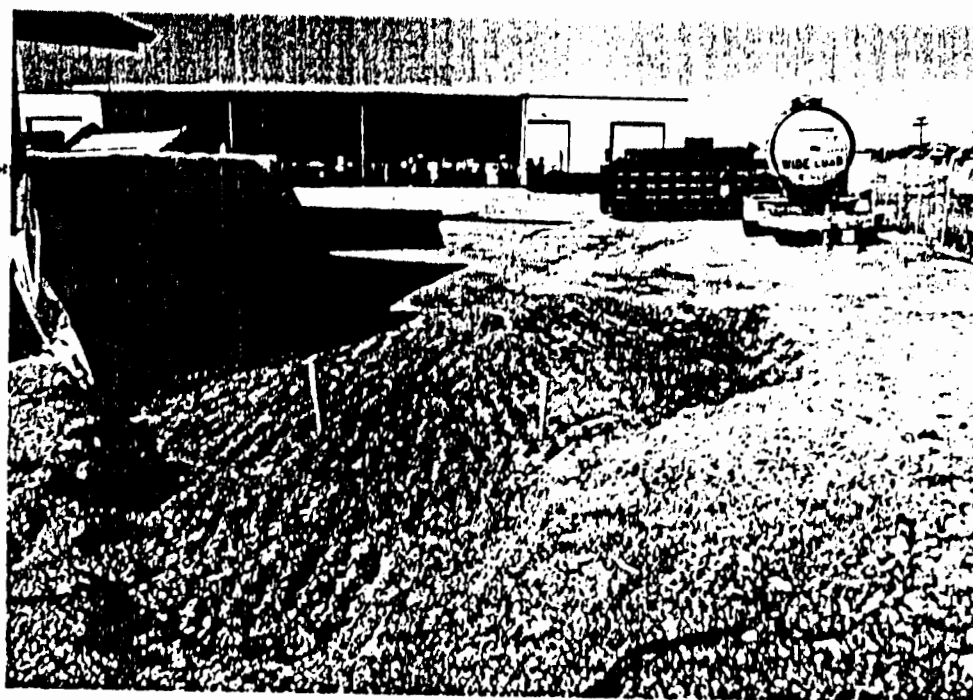












**G. FERRABEE COMPANY**  
 General Engineering Contractors  
 P. O. Box 5428  
 CONCORD, CALIFORNIA 94524  
 Phone 939-0422

PROPOSAL SUBMITTED TO <i>BAY AREA ENVIRONMENTAL</i>		PHONE <i>233-8601</i>	DATE <i>9/8/87</i>
STREET <i>1125 HENSLEY ST.</i>		JOB NAME <i>ADDITION TO PARKING LOT</i>	
CITY, STATE AND ZIP CODE <i>RICHMOND, CA. 94804</i>		JOB LOCATION <i>SAME</i>	
ARCHITECT	DATE OF PLANS	JOB PHONE	

We hereby submit specifications and estimates for:

- ① *RE-WORK EXISTING ROCK*  
*ADD AB AS NEEDED - 100 TON ±* *\$3800<sup>00</sup>*  
*FINISH GRADE AB*
- ② *INSTALL 3" AC*  
*INSTALL ASPHALT BERM* *\$13,400<sup>00</sup>*

**We Propose** hereby to furnish material and labor — complete in accordance with above specifications, for the sum of:

Payment to be made as follows: \_\_\_\_\_ dollars (\$ \_\_\_\_\_).

*UPON COMPLETION*

All material is guaranteed to be as specified. All work to be completed in a workmanlike manner according to standard practices. Any alteration or deviation from above specifications involving extra costs will be executed only upon written orders, and will become an extra charge over and above the estimate. All agreements contingent upon strikes, accidents or delays beyond our control. Owner to carry fire, tornado and other necessary insurance. Our workers are fully covered by Workmen's Compensation Insurance.

Authorized Signature *Stephen Alan J.*  
 Note: This proposal may be withdrawn by us if not accepted within *30* days.

**Acceptance of Proposal** — The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above.

Date of Acceptance: *9/21/87*

Signature *Paul [Signature]*  
 Signature \_\_\_\_\_

(k) 24-Hour Reporting

The owner or operator shall report to the California State Department of Health Services any noncompliance which may endanger health or the environment. Any information shall be provided verbally within 24 hours from the time the owner or operator becomes aware of the circumstances. The following shall be included as information which must be reported verbally within 24 hours:

- (1) Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies.
- (2) Any information of a release or discharge of hazardous waste, or of a fire or explosion from the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
  - (i) Name, address, and telephone number of the owner or operator;
  - (ii) Name, address, and telephone number of facility;
  - (iii) Date, time and type of incident;
  - (iv) Name and quantity of material(s) involved;
  - (v) The extent of injuries, if any;
  - (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
  - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within five days of the time the owner or operator becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times), and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

The owner or operator need not comply with the 5-day written requirement if the California State Department of Health Services waives that requirement and the owner or operator submits a written report within 15 days of the time the owner or operator becomes aware of the circumstances.

(l) Other Noncompliance

The owner or operator shall report all other instances of noncompliance not otherwise required to be reported at the time monitoring or other

# code of federal regulations

Protection of  
Environment

**40**

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PARTS 190 to 399

Revised as of July 1, 1982

CONTAINING  
A CODIFICATION OF DOCUMENTS  
OF GENERAL APPLICABILITY  
AND FUTURE EFFECT

AS OF JULY 1, 1982

*With Ancillaries*

Published by  
the Office of the Federal Register  
National Archives and Records Service  
General Services Administration

as a Special Edition of  
the Federal Register





(2) As used in paragraph (a)(1) of this section:

(i) "Fault" means a fracture along which rocks on one side have been displaced with respect to those on the other side.

(ii) "Displacement" means the relative movement of any two sides of a fault measured in any direction.

(iii) "Holocene" means the most recent epoch of the Quaternary period, extending from the end of the Pleistocene to the present.

*Comment:* Procedures for demonstrating compliance with this standard in Part B of the permit application are specified in § 264.33(a)(11). Facilities which are located in political jurisdictions other than those listed in Appendix VI of this Part, are assumed to be in compliance with this requirement.]

(b) *Floodplains.* (1) A facility located in a 100-year floodplain must be designed, constructed, operated and maintained to prevent washout of any hazardous waste by a 100-year flood. (2) The owner or operator can demonstrate to the Regional Administrator that procedures are in effect which will cause the waste to be removed safely, before flood waters can reach the facility, to a location where the wastes will not be vulnerable to flood-ters.

*Comment:* The location where wastes are stored must be a facility which is either permitted by EPA under Part 122 of this Chapter, authorized to manage hazardous waste at a State with a hazardous waste management program authorized under Part 123 of this Chapter, or in interim status under Part 122 and 265 of this Chapter.]

(3) As used in paragraph (b)(1) of this section:

(i) "100-year floodplain" means any area which is subject to a one percent or greater chance of flooding in any given year from any source.

(ii) "Washout" means the movement of hazardous waste from the active area of the facility as a result of flooding.

(iii) "100-year flood" means a flood which has a one percent chance of being equaled or exceeded in any given year.

*Comment:* (1) Requirements pertaining to Federal laws which affect the location and permitting of facilities are found in Part 122 of this Chapter. For details relative

to these laws, see EPA's manual for SEA (special environmental area) requirements for hazardous waste facility permits. Through EPA is responsible for complying with these requirements, applicants are advised to consider them in planning the location of a facility to help prevent subsequent project delays.]

[46 FR 2848, Jan. 12, 1981]

### Subpart C—Preparedness and Prevention

#### § 264.30 Applicability.

The regulations in this subpart apply to owners and operators of all hazardous waste facilities, except as § 264.1 provides otherwise.

#### § 264.31 Design and operation of facility.

Facilities must be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

#### § 264.32 Required equipment.

All facilities must be equipped with the following, *unless* it can be demonstrated to the Regional Administrator that none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

(a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;

(b) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams;

(c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and

(d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or auto-

matic sprinklers, or water spray systems.

*[Comment:* Part 122, Subpart B, of this Chapter requires that an owner or operator who wishes to make the demonstration referred to above must do so with Part B of the permit application.]

#### § 264.33 Testing and maintenance of equipment.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.

#### § 264.34 Access to communications or alarm system.

(a) Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, *unless* the Regional Administrator has ruled that such a device is not required under § 264.32.

(b) If there is ever just one employee on the premises while the facility is operating, he must have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, *unless* the Regional Administrator has ruled that such a device is not required under § 264.32.

#### § 264.35 Required aisle space.

The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* it can be demonstrated to the Regional Administrator that aisle space is not needed for any of these purposes.

*[Comment:* Part 122, Subpart B, of this Chapter requires that an owner or operator who wishes to make the demonstration referred to above must do so with Part B of the permit application.]

#### § 264.36 [Reserved]

#### § 264.37 Arrangements with local authorities.

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

### Subpart D—Contingency Plan and Emergency Procedures

#### § 264.50 Applicability.

The regulations in this subpart apply to owners and operators of all hazardous waste facilities, except as § 264.1 provides otherwise.

#### § 264.51 Purpose and implementation of contingency plan.

(a) Each owner or operator must have a contingency plan for his facility. The contingency plan must be designed to minimize hazards to human

or surface water, or any other material that results from a release, fire, or explosion at the facility.

[Comment: Unless the owner or operator can demonstrate, in accordance with § 261.3(c) or (d) of this Chapter, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 262, 263, and 264 of this Chapter.]

(h) The emergency coordinator must ensure that, in the affected area(s) of the facility:

(1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and

(2) All emergency equipment listed in the contingency plan is cleaned and it for its intended use before operations are resumed.

(i) The owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that the facility is in compliance with paragraph (h) of this section before operations are resumed in the affected area(s) of the facility.

(j) The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:

(1) Name, address, and telephone number of the owner or operator;

(2) Name, address, and telephone number of the facility;

(3) Date, time, and type of incident (e.g., fire, explosion);

(4) Name and quantity of material(s) involved;

(5) The extent of injuries, if any;

(6) An assessment of actual or potential hazards to human health or the environment, where this is applicable;

(7) Estimated quantity and disposition of recovered material that resulted from the incident.

**Subpart E—Manifest System, Recordkeeping, and Reporting**

**§ 264.70 Applicability.**

The regulations in this subpart apply to owners and operators of both on-site and off-site facilities, except as § 264.1 provides otherwise. Sections 264.71, 264.72, and 264.76 do not apply to owners and operators of on-site facilities that do not receive any hazardous waste from off-site sources.

**§ 264.71 Use of manifest system.**

(a) If a facility receives hazardous waste accompanied by a manifest, the owner or operator, or his agent, must:

(1) Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received;

(2) Note any significant discrepancies in the manifest (as defined in § 264.72(a)) on each copy of the manifest;

[Comment: The Agency does not intend that the owner or operator of a facility whose procedures under § 264.13(c) include waste analysis must perform that analysis before signing the manifest and giving it to the transporter. Section 264.72(b), however, requires reporting an unreconciled discrepancy discovered during later analysis.]

(3) Immediately give the transporter at least one copy of the signed manifest;

(4) Within 30 days after the delivery, send a copy of the manifest to the generator; and

(5) Retain at the facility a copy of each manifest for at least three years from the date of delivery.

(b) If a facility receives, from a rail or water (bulk shipment) transporter, hazardous waste which is accompanied by a shipping paper containing all the information required on the manifest (excluding the EPA identification numbers, generator's certification, and signatures), the owner or operator, or his agent, must:

(1) Sign and date each copy of the manifest or shipping paper (if the manifest has not been received) to certify that the hazardous waste covered by the manifest or shipping paper was received;

(2) Note any significant discrepancies (as defined in § 264.72(a)) in the manifest or shipping paper (if the manifest has not been received) on each copy of the manifest or shipping paper.

[Comment: The Agency does not intend that the owner or operator of a facility whose procedures under § 264.13(c) include waste analysis must perform that analysis before signing the shipping paper and giving it to the transporter. Section 264.72(b), however, requires reporting an unreconciled discrepancy discovered during later analysis.]

(3) Immediately give the rail or water (bulk shipment) transporter at least one copy of the manifest or shipping paper (if the manifest has not been received);

(4) Within 30 days after the delivery, send a copy of the signed and dated manifest to the generator; however, if the manifest has not been received within 30 days after delivery, the owner or operator, or his agent, must send a copy of the shipping paper signed and dated to the generator; and

[Comment: Section 262.23(c) of this chapter requires the generator to send three copies of the manifest to the facility when hazardous waste is sent by rail or water (bulk shipment).]

(5) Retain at the facility a copy of the manifest and shipping paper (if signed in lieu of the manifest at the time of delivery) for at least three years from the date of delivery.

(c) Whenever a shipment of hazardous waste is initiated from a facility, the owner or operator of that facility must comply with the requirements of Part 262 of this chapter.

[Comment: The provisions of § 262.34 are applicable to the on-site accumulation of hazardous wastes by generators. Therefore, the provisions of § 262.34 only apply to owners or operators who are shipping hazardous waste which they generated at that facility.]

[45 FR 33221, May 19, 1980, as amended at 45 FR 86970, 86974, Dec. 31, 1980]

**§ 264.72 Manifest discrepancies.**

(a) Manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest or shipping paper, and the quantity or type of hazardous waste a facility actually receives. Significant

discrepancies in quantity are: (1) For bulk waste, variations greater than 10 percent in weight, and (2) for batch waste, any variation in piece count, such as a discrepancy of one drum in a truckload. Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest or shipping paper.

(b) Upon discovering a significant discrepancy, the owner or operator must attempt to reconcile the discrepancy with the waste generator or transporter (e.g., with telephone conversations). If the discrepancy is not resolved within 15 days after receiving the waste, the owner or operator must immediately submit to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue.

**§ 264.73 Operating record.**

(a) The owner or operator must keep a written operating record at his facility.

(b) The following information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility:

(1) A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by Appendix I;

(2) The location of each hazardous waste within the facility and the quantity at each location. For disposal facilities, the location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. For all facilities, this information must include cross-references to specific manifest document numbers, if the waste was accompanied by a manifest;

[Comment: See § 264.119 for related requirements.]

(3) Records and results of waste analyses performed as specified in §§ 264.13, 264.17, and 264.341;

(4) Summary reports and details of all incidents that require implement-



**BAY AREA  
ENVIRONMENTAL**

SPECIAL MEETING

November 5, 1987

The purpose of the special meeting was to provide various state and local agencies, as well as BAE management, the opportunity to voice concerns and to discuss procedures followed during the period of time immediately following the July 20, 1987 incident which took place at the J.J. Magana/BAE facility.

The meeting convened at 9:00 a.m. at the BAE facility and was continued at 11:00 a.m. at the fire station located near BAE, on the corner of 7th and Hensley Streets in Richmond, California. Mr. David L. Wise, Senior Emergency Planning Coordinator for the Contra Costa County Office of Emergency Services acted as moderator for the meeting. Also in attendance were, from Bay Area Environmental, Mr. Robert Sisneros and Mr. Robert Neal; from the Contra Costa County Department of Health Services, Mr. Jerry Pando, and Mr. Bruce Benike; from the California Department of Health Services, Mr. Jim McCammon; Fire Inspector Don McClanahan and other members of the Richmond Fire and Police Departments.

Copies of a Richmond P.D. inner office memorandum dated July 21, 1987 were issued to those present today (see attached). This memorandum was a synopsis of the events which took place regarding the July 20, 1987 incident and was the outline used for this meeting.

Topics covered included the notification process and responsibility, scene isolation, product identification, response, media involvement and recovery and clean up.

Concern was voiced by one employee of the fire department that the identification of the chemicals involved was not immediate. He stated that a plot plan was not available and that there was some difficulty in locating the correct manifest.

In response, Mr. Sisneros stated that once he was able to view the scene an immediate and accurate identification was in fact given. He said that an inaccurate description of chemicals involved could be catastrophic and stressed the importance of an accurate identification. His statements were verified by Mr. Benike of the Contra Costa County Department of Health Services who stated that a simple action such as spraying the area with water would have worsened the situation.



**BAY AREA  
ENVIRONMENTAL**

Mr. Benike acknowledged that a manifest does not always provide all required information and should not be solely relied upon in an emergency situation. It was noted that BAE does currently have a business plan and a plot plan and will insure that key agencies have access to the plans in an emergency situation.

Mr. Wise noted that the notification process must be streamlined by the responsible agencies and Mr. McClanahan noted that efforts are under way to make the dispatching process more efficient.

Mr. Neal suggested that a key contact be available at 911 dispatch for relaying information to be used should an emergency occur. Mr. McClanahan agreed that such advance planning is necessary and took responsibility for designing and implementing this procedure.

Mr. McClanahan noted that there was a need for cellular telephones in vehicles that are used to respond to emergency situations in order to insure that various agencies can be notified within the time frames required by law. He said depending on the location of the emergency and the air quality and wind direction, there may be no telephone access.

Mr. Wise asked representatives of the fire department if they felt they had adequate clothing and protection when dealing with this type of emergency. One gentleman responded that at the present time the fire department was not trained to use the type of special protective gear worn by hazardous waste specialists. Mr. Benike added that the SCBA suits currently in use by fire department employees offers adequate protection.

Mr. Benike said that the the basic function of his department is to take samples. Many feel, incorrectly, that the burden lies with C.C.C. DOHS however they are not equipped to handle large leaks without the assistance of a specialist (usually the manufacturer of the product involved). They are however prepared and willing to deal with small leaks if necessary. This was in response to Mr. McClanahan who asked what agencies should be contacted first. Mr. Benike also said that there are no rules to follow which will govern every emergency situation.



**BAY AREA  
ENVIRONMENTAL**

Mr. Pando emphasized that under AB 2185 the OES should be notified within one (1) hour of an emergency by calling the 800 OES telephone number.

Media involvement was also discussed. Mr. Wise suggested that a Public Information Officer be available to the media and that only that officer have the authority to release information to the press. It was agreed that this would be a beneficial policy for all businesses and organizations.

Mr. Sisneros was asked to outline the procedures followed with reference to recovery and clean up during the July 20, 1987 incident. He listed the agencies contacted as well as the steps taken to neutralize and clean the contaminated area.

Mr. Pando asked which department or organization makes the determination that contaminated soil has been rendered clean enough or "safe". Mr. Sisneros answered that determination comes from the Regional Water Quality Control Board. He added that BAE has received notification from the Regional Water Quality Board that it is satisfied with the BAE facility concerning this incident.

Mr. McCammon questioned the location of the drums on the date in question. Mr. Sisneros replied that the location may have directly reduced the severity of the situation. Mr. McCammon then asked why the generator of the waste had been allowed to work in the BAE facility transferring the waste material from drums to DOT containers. Mr. Sisneros responded that procedure has now been changed and waste generators are no longer permitted to work in the facility.

Mr. Benike stated that in this particular situation, the hazardous material was contained in the original barrels for 10-12 days without incident. The problem arose after the transfer of the material to DOT approved containers. This was verified by Mr. Sisneros.

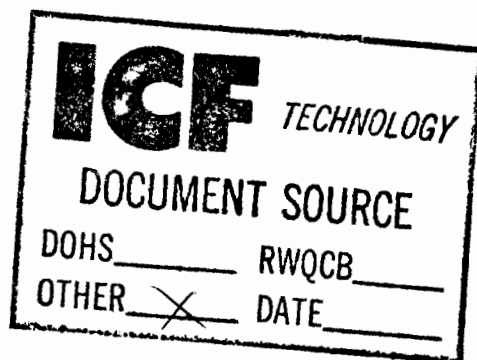
It was also noted that the BAE facility lock had to be cut off on July 20 in order to gain access to the facility. It was suggested that perhaps all dump sites should have easier access for key emergency response teams.

Mr. Wise said that efforts will be under way to introduce a more streamlined method for handling emergency situations. He thanked all present for their attendance and contributions. The meeting was adjourned at 1:30 p.m.

9. Section 67245, Title 22, California Code of Regulations:

Containers of hazardous waste were stored outside the bermed containment areas on 20 July 1987. Chemical reaction in the containers caused them to rupture, releasing hazardous waste to the soil.

At the time of the 12 August inspection, drums and pails of hazardous waste were stored outside the bermed containment areas of the drum storage bays in violation of Parts IV. 1.(c) and IV. 2.(1) of the Hazardous Waste Facility Permit and Part VIII of the Operation Plan.



9A. RESPONSE

On July 26, 1987, containers were stored in the "transfer facility" area as allowed under the in transit provisions of the regulations. This provision allows 144 hours to transfer shipments of hazardous waste during the normal course of transportation. At the time of the incident the regulations allowed for 96 hours in transit.

The containers were labeled and ready for shipment with the Manifests already prepared.

9B. RESPONSE

At the time of August 12 we believe that the drums and pails referenced were empty. There were approximately 60 empty pails and drums from a project in Hawaii, (Maui Pineapple Company, manifest 87041613), that were waiting to be compacted for disposal. The stickers were left on the drums and pails to identify them, but they only contained residue.

Normally empty containers are processed within 2 days of receipt at the facility. In this case however, special safety gear was required for the operators. This equipment was ordered and received approximately one (1) month later.

GENERATOR

TRANSPORTER

FACILITY

UNIFORM HAZARDOUS  
WASTE MANIFEST

Generator's US EPA ID No

Manifest Document No.

Page 1 of 1  
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address DUY PINEAPPLE CO. LTD. 670 HALIMAILE HIGHWAY - HALIMAILE, HI 96705		A. State Manifest Document Number 87542613	
4. Generator's Phone (808) 572-7211		B. State Generator's ID	
5. Transporter 1 Company Name MATSON NAVIGATION		C. State Transporter's ID CAD096912620	
6. US EPA ID Number CAD000001220		D. Transporter's Phone 808-877-5005	
7. Transporter 2 Company Name DOM'S BARREL CO.		E. State Transporter's ID 0249	
8. US EPA ID Number CAT0000611210		F. Transporter's Phone 415-233-7173	
9. Designated Facility Name and Site Address BAY AREA ENVIRONMENTAL, INC. 1125 HENSLEY ST. RICHMOND, CA 94801		G. State Facility's ID CAT0800114079	
10. US EPA ID Number CAT080014079		H. Facility's Phone 415-233-8001 415-233-8001	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity
a. Waste, Poison B Liquid, N.O.S. UN 2810, Poison B		071 D F	31950
b. Waste, Poison B Liquid, N.O.S. UN 2810, Poison B		005 D M	2250
c. Waste, Hazardous Waste Solid, ORM-E, NA 9189		001 D M	100
d. Waste, Hazardous Waste Solid, ORM-E, NA 9189		003 D F	60
J. Additional Descriptions for Materials Listed Above a. 80% DECP in petroleum distillates in DOT-34-30 drums b. 80% DECP in petroleum distillates overpacked in DOT17H c. Contaminated absorbant from site clean-up after removal d. Empty DOT-34-30 drums previously containing DECP		K. Handling Codes for Wastes Listed Above a. b. c. d.	
15. Special Handling Instructions and Additional Information "KEEP AWAY FROM SPARKS AND OPEN FLAMES, WEAR PROTECTIVE CLOTHING WHILE HANDLING" Please see attachment			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.			
Printed/Typed Name David D.F. Williams		Signature [Signature] Month Day Year 06 25 87	
17. Transporter 1 Acknowledgement of Receipt of Materials		Month Day Year	
Printed/Typed Name [Signature]		Signature [Signature] Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Month Day Year	
Printed/Typed Name E. SNEDE		Signature [Signature] Month Day Year	
19. Discrepancy Indication Space			
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.			
Printed/Typed Name		Signature Month Day Year	



## Assembly Bill No. 1293

## CHAPTER 293

An act to amend Section 25123.3 of the Health and Safety Code, relating to hazardous waste.

[Approved by Governor July 29, 1987. Filed with Secretary of State July 30, 1987.]

## LEGISLATIVE COUNSEL'S DIGEST

AB 1293, Wright. Hazardous waste: storage.

Existing law requires operators of hazardous waste storage facilities to obtain a hazardous waste facilities permit and defines storage facility as including a facility where (1) hazardous waste is contained in a tank for any period of time and above specified amounts, unless the tank is a portable tank or meets specified requirements concerning the waste's accumulation, and (2) where hazardous waste is contained at a transfer facility, as defined, for periods greater than 96 hours.

This bill would revise this definition of storage facility to include any facility where hazardous waste is stored for any period of time and above the same amounts, thereby imposing a state-mandated local program by creating a new crime. The bill would exclude from this requirement hazardous waste stored in a portable tank or hazardous waste which meets specified requirements concerning its accumulation. The bill would also increase the amount of time for which the hazardous waste may be contained at a transfer facility to 144 hours.

(2) The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that no reimbursement is required by this act for a specified reason.

*The people of the State of California do enact as follows:*

SECTION 1. Section 25123.3 of the Health and Safety Code is amended to read:

25123.3. (a) "Storage facility" means a hazardous waste facility at which the hazardous waste meets any of the following requirements:

(1) The hazardous waste is contained for periods greater than 90 days at an onsite facility.

(2) The hazardous waste is contained for any period of time and the quantities of the hazardous waste exceed 5,000 gallons or 45,000 pounds, whichever is greater. For purposes of this paragraph, these

quantities do not include hazardous waste stored in a portable tank used for a period of not more than 60 calendar days at an onsite facility or hazardous waste accumulated onsite which has been generated from onsite maintenance operations which occur less frequently than annually.

(3) The hazardous waste is contained for any period of time at an offsite facility which is not a transfer facility.

(4) The hazardous waste is contained at a transfer facility for periods greater than 144 hours.

(b) The time period for calculating the 90-day period for purposes of paragraph (1) of subdivision (a) begins when the facility has accumulated 100 kilograms of hazardous waste or 1 kilogram of extremely hazardous waste, except that, if the facility generates more than 100 kilograms of hazardous waste or 1 kilogram of extremely hazardous waste during any calendar month, the time period begins when any amount of hazardous waste first begins to accumulate.

(c) For purposes of this section, "transfer facility" means any offsite facility which is related to the transportation of hazardous waste, including, but not limited to, loading docks, parking areas, storage areas, and other similar areas where shipments of hazardous waste are held during the normal course of transportation. (144 hours)

SEC. 2. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution because the only costs which may be incurred by a local agency or school district will be incurred because this act creates a new crime or infraction, changes the definition of a crime or infraction, changes the penalty for a crime or infraction, or eliminates a crime or infraction.



HAZARDOUS WASTE

SURVEILLANCE AND COMPLIANCE REPORT



DATE June 26, 1985

FIRM NAME Bay Area Environmental

SITE CLASSIFICATION ☐ I ☐ II-1 ☐ II-2 ☐ III

ADDRESS 1125 Henocly St.

☐ Other \_\_\_\_\_

Richmond, CA 94804

SITE PERMIT NO. CAT 080014079

Purpose: Permitted facility inspection.

Ownership: J.T. Magana Corp.

P.O. Box 579

San Pablo, CA 94806

Background: Facility was issued a Hazardous Waste Facility Permit on July 7, 1983. The facility was last inspected on March 16, 1984. No violations were observed during that inspection.

Persons present: Donald Oliva, manager, Bay Area Environmental  
Charlene Williams, Waste Management Specialist,  
DOHS/TSCD.

Description of Facility: Bay Area Environmental is a transfer station for containerized hazardous wastes.

Violations observed:

See attached "Generator Checklist".

Other observations:

Facility has installed additional security devices; two light ray silent alarm systems.

Discussion with Management:

Management agreed to correct violations.

DATE June 26, 1985

## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY  
BERKELEY, CA 94704SURVEILLANCE AND COMPLIANCE REPORT  
HAZARDUS WASTE GENERATORDate of Inspection: 6-12-85EPA I.D. # CAT 080014079Inspector's Name: Charlene Williams

Generator Name/Address

Mailing Address

Ownership

Bay Area Environmental1125 Hensley St.Richmond, CA94804P.O. Box 579San Pablo, CA94806JJ. Magana Corp.P.O. Box 579San Pablo, CA 94806County Contra Costa

Type of business:

Persons present

Contact Person Donald Olivatransfer stationDonald OlivaPhone # (415) 233-8001Charlene WilliamsSamples taken: Yes ☐ (receipt attached) No ☒Avg. Gen. Rate (monthly): ~20 drumsPlan of Correction necessary: Yes ☒ (Due date: 7-26-85) No ☐

## Discussion with Management:

Discuss generator violations. Facility agrees to submit POC.Facility operating under ISD? Yes ☐ No ☒ Final RCRA permit

On this date an inspection of your facility was conducted under authority of Section 25185, California Health & Safety Code and Section 66328, California Administrative Code. The collection of samples or other evidence, including the taking of photographs, was done under authority of Section 66328, California Administrative Code. Specific violations of one or more Sections of the California Health & Safety Code, Division 20; California Administrative Code, Title 22; or Code of Federal Regulations, Part 40 are noted on the attached document. These violations relate to the generation, storage, handling, transportation, and/or disposal of hazardous and extremely hazardous waste.

## Authorized Representative of Firm\*

Name Donald R. OlivaTitle MANAGERSignature [Signature]Date 6-26-85

## Authorized State Agent

Name Charlene WilliamsSignature [Signature]Date 6-26-85

\*Signature of firm representative signifies receipt of copy of this form

# KEY TO GENERATOR CHECKLIST

1. ALL GEN - Asterisks appearing in this column indicate those sections applying to all generators of hazardous waste (sections for which small quantity generation limit does not apply)
2. H & S - Health and Safety Code, Division 20, Chapter 6.5
3. CAC - California Administrative Code, Title 22, Division 4, Chapter 30
4. 40 CFR - Code of Federal Regulations Part 40
5. Section Description - see attached information for further explanation
6. Cmt. - See Comments page (attached to back of Generator Checklist if necessary)

SECTION #				GENERATOR CHECKLIST	In Compliance?			
All Gen	H&S <sup>2</sup>	CAC <sup>3</sup>	AG CER <sup>4</sup>	Section Description <sup>5</sup>	Yes	No	N/A	Cmt. <sup>6</sup>
				HAZARDOUS WASTE DETERMINATION				
*		66505 (a,b)	262 .11	Hazardous waste determination made for all waste	✓			
				HAZARDOUS WASTE FACILITY				
*	25123 .3	66370	262.34 .(a)(1)	Generator does not store waste on-site for more than 90 days			✓	
*		66370		Generator does not treat waste on-site	✓			
*		66370		Generator does not dispose of waste on-site	✓			
				EPA IDENTIFICATION NUMBER				
			262 .12	Generator has EPA I.D. # (See Face Sheet)	✓			
				MANIFEST				
*		66470	262 .20	Applicable sections accurately completed for all waste transported off-site				
*		66475 (a-f)	262 .21 & .23	The following is on all manifests:				
				Manifest document number	✓			
				Name, mailing address, phone #, EPA ID # of Generator		✓		✓
				Name, EPA ID # of Transporter(s)	✓			
				Name, address, EPA ID # of designated/alternative facility	✓			
				DOT description of waste(s)	✓			
				Total quantity of wastes(s) and type/# containers	✓			
				Certification statement/Required signatures	✓			

FIRM NAME: Bay Area Environmental

Page 2 of 6

SECTION #				GENERATOR CHECKLIST	In Compliance?			
All Gen	H&S <sup>2</sup>	CAC <sup>3</sup>	40 CFR <sup>4</sup>	Section Description <sup>5</sup>	Yes	No	N/A	Cmt. <sup>6</sup>
				MANIFEST (continued)				
			262.22	Copies of manifest available for review	✓			
*		66475 (g)		Properly completed copies submitted monthly to DOHS	✓			
			262.42(a)	Status of TSD facility copy determined if not returned in 35 days	✓		✓	
			262.42(b)	Exception reports submitted to DOHS within 45 days	✓		✓	
					N/A			
				DEPOSITION OF WASTE				
*		66505 (c)		Hazardous waste taken only to a State approved facility	✓			
				EXTREMELY HAZARDOUS WASTE				
*		66570 (a,b)		Extremely hazardous waste not handled/disposed of without permit	✓			
*		66570 (d)		No deviation from DOHS approved handling/disposal methods	✓			
				USE AND MANAGEMENT OF CONTAINERS				
			265.171	Containers are in good condition	✓			
*		66500 (c)	265.172	Containers are compatible with waste in them	✓			
			265.173(a)	Containers are stored closed	✓			
			265.173(b)	Containers are managed to prevent leaks	✓			
			265.174	Containers are inspected weekly for leaks/defects	✓			
			265.176	Ignitable/reactive wastes stored 50' (15m) from facility property line			✓	✓
*		66500 (a)	265.176	Contact/mixing of incompatibles does not occur	✓			

SECTION #				GENERATOR CHECKLIST	In Compliance?			
All Gen	H&S <sup>2</sup>	CAC <sup>3</sup>	40 CFR <sup>4</sup>	Section Description <sup>5</sup>	Yes	No	N/A	Cmt. <sup>6</sup>
				USE AND MANAGEMENT OF CONTAINERS (continued)	✓			
*		66500 (b)	265 .176	Incompatibles are stored/protected in separate containers	✓			
				TANKS				
			265 .192(b)	Stored waste does not cause corrosion, leakage, or premature failure			✓	
			265 .192(c)	Uncovered tanks have 2' (60cm) freeboard, dikes or other containment structures	✓		✓	
			265 .192(d)	Continuous feed systems have waste-feed cutoff			✓	
			265 .193	Waste analysis done if substantially different waste is to be placed in tank			✓	
			265 .194	Discharge control equipment, operating equipment, and waste level checked daily			✓	
			265 .194	Construction materials of tank/containment area checked weekly			✓	
			265 .197	At site closure, all hazardous waste, residues, and contaminated equipment will be properly disposed			✓	
			265 .198 (a)(2)	Ignitable/reactive waste protected from any material that would cause it to ignite/react			✓	
			265 .198(b)	NFPA buffer zone for tanks observed			✓	
*		66500 (b)	265 .199	Incompatibles are stored/protected in separate tanks			✓	
				PRE-TRANSPORT REQUIREMENTS				
			262 .30-33	Waste is packaged, labelled, and placarded according to 49 CFR (DOT)	✓			
			262 .32(b)	Each container of 110G, or less, marked as follows:	✓			
				HAZARDOUS WASTE—Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.				
				Generator's Name and Address _____				
				Manifest Document Number _____				

SECTION #				GENERATOR CHECKLIST	In Compliance?			
All Gen	H&S <sup>2</sup>	CAC <sup>3</sup>	40 CFR <sup>4</sup>	Section Description <sup>5</sup>	Yes	No	N/A	Cmt. <sup>6</sup>
				ACCUMULATION TIME				
*	25123.3		262.34 (a)(1)	All waste moved off-site within 90 days of accumulation commencement to approved facility			✓	
			262.34 (a)(2)	All waste is in properly managed tanks/containers	✓			
			262.34 (a)(3)	Containers visibly marked with date of accumulation commencement		all CAC		✓
				TRAINING, EMERGENCY PROCEDURES				
			265.16	Personnel trained OTJ or in classroom within 6 months of employment (or as of 5/19/80)	✓			
			265.16	Training direction by person trained in hazardous waste management	✓			
			265.16	Training includes emergency response procedures and emergency equipment use	✓			
			265.16	Personnel training records include titles, job description, dates/type training			not	✓
			265.17	Special training for ignitables, reactive, or incompatible waste: special handling, no smoking signs, separation/protection from ignition source.	✓			
				PREPAREDNESS AND PREVENTION				
			265.32	Appropriate communications/alarm systems	✓			
			265.32	Appropriate firefighting, spill control, and decontamination equipment	✓			
			265.32	Adequate water (or foam) supply for fire control	✓			
			265.33	Adequate testing/maintenance procedures for emergency equipment	✓			
			265.33	Emergency equipment maintained in operable condition	✓			
			265.34	Immediate access to internal alarm systems	✓			
			265.35	Adequate aisle space for unobstructed movement	✓			



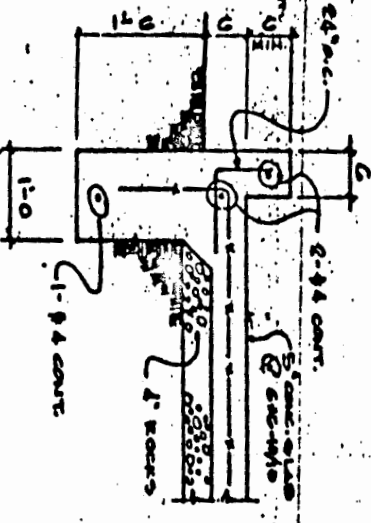
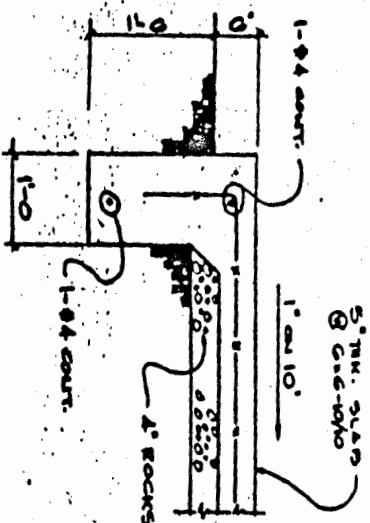
SECTION #				GENERATOR CHECKLIST	In Compliance?			
All Gen	H&S <sup>2</sup>	CAC <sup>3</sup>	40 CFR <sup>4</sup>	Section Description <sup>5</sup>	Yes	No	N/A	Cmt. <sup>6</sup>
				CONTINGENCY PLAN AND EMERGENCY PROCEDURES				
			265.37	Arrangements with local authorities/emergency response teams	✓			
			265.51 & 53	Generator has prepared contingency plan and maintains at site	✓			
			265.51	Contingency plan specifies actions for personnel in case of fire, explosion, unplanned releases	✓			
			265.52	Names, addresses, phone #'s of all qualified emergency coordinators	✓			
			265.52	List of emergency equipment specifying location, description, and capabilities	✓			
			265.52	Evacuation plan (including signals, routes, and alternates)	✓			
			265.53	Copies of contingency plan available at site and local emergency agencies	✓			
			265.54	Contingency plan is amended whenever necessary	✓			
			265.55	Emergency coordinator familiar with all aspects of site operating/emergency procedures	✓			
			265.55	Emergency coordinator has authority to carry out contingency plan	✓			
			265.56(a)	If emergency (imminent/actual) has occurred, emergency coordinator has activated alarm/communications system notified appropriate State/	✓			
			265.56(b)	If actual emergency has occurred, emergency coordinator has identified character, exact source, amount, extent, local authorities.	✓			
			265.56(c)(d)	If actual emergency has occurred, emergency coordinator has reported	✓			
				determined health/environmental hazards and notified appropriate government officials.	✓			
			265.56(e)	If actual emergency occurs, emergency coordinator takes all reasonable measures necessary to stop spreading	✓			
			265.56(f)	Equipment stopped during emergency monitored for intactness	✓			
			265.56(g)	Released waste/contaminated equipment properly treated, stored, disposed	✓			
			265.56(h)	Contaminated emergency equipment cleaned/incompatibles kept separate	✓			
			265.56(i)	Notification of State, after "emergency", that site is in compliance with 265.56(h)	✓			
			265.56(j)	All appropriate data (from emergencies) logged in operating record and submit report to State within 15 days of accident	✓			

[illegible]

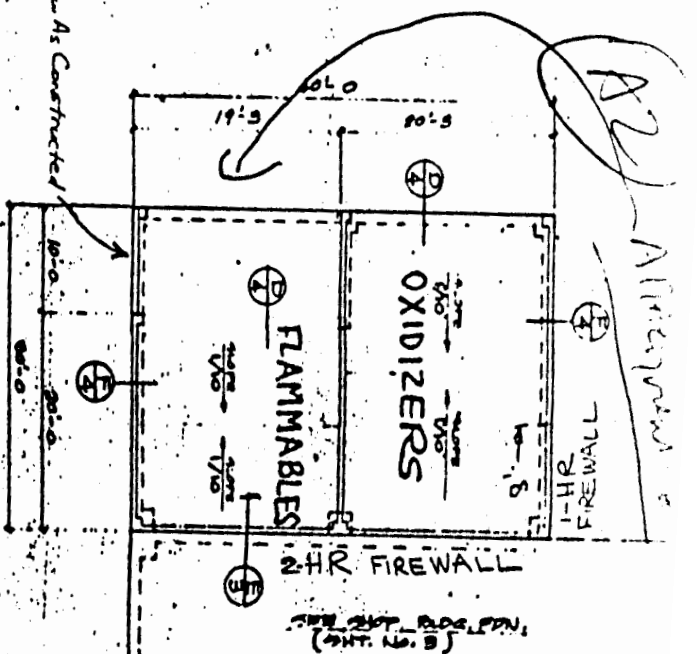
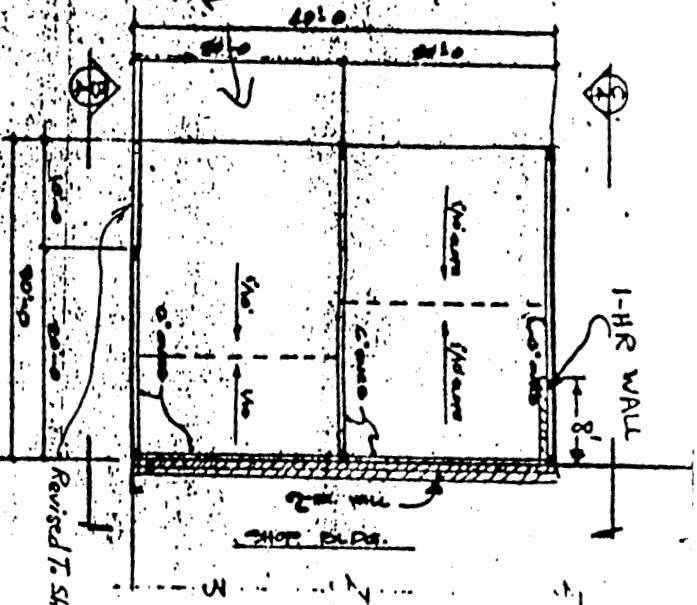
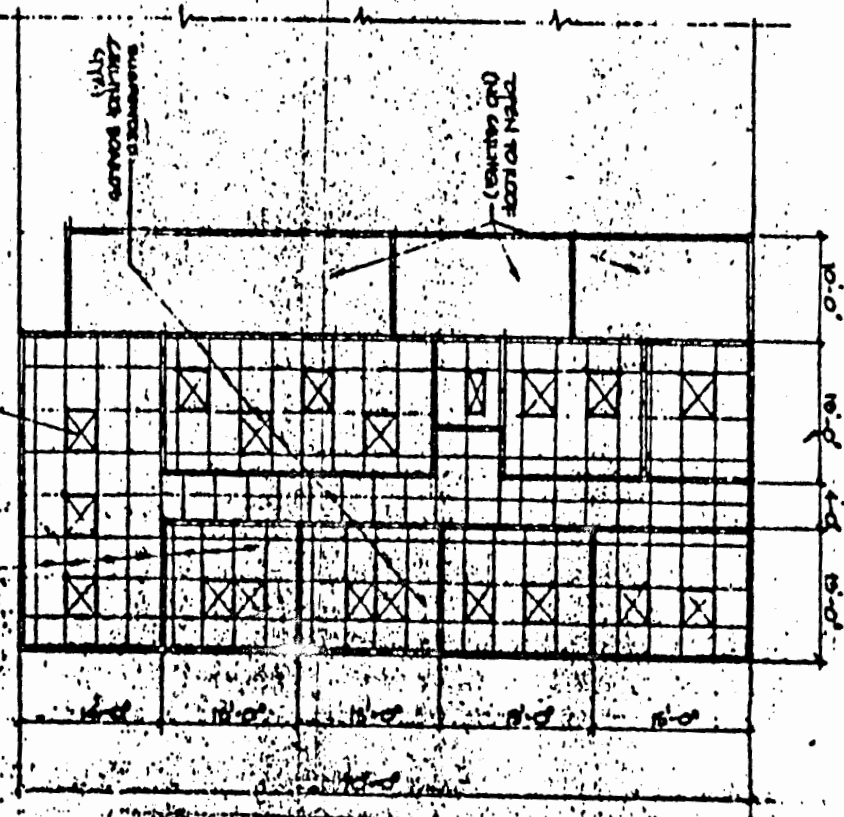
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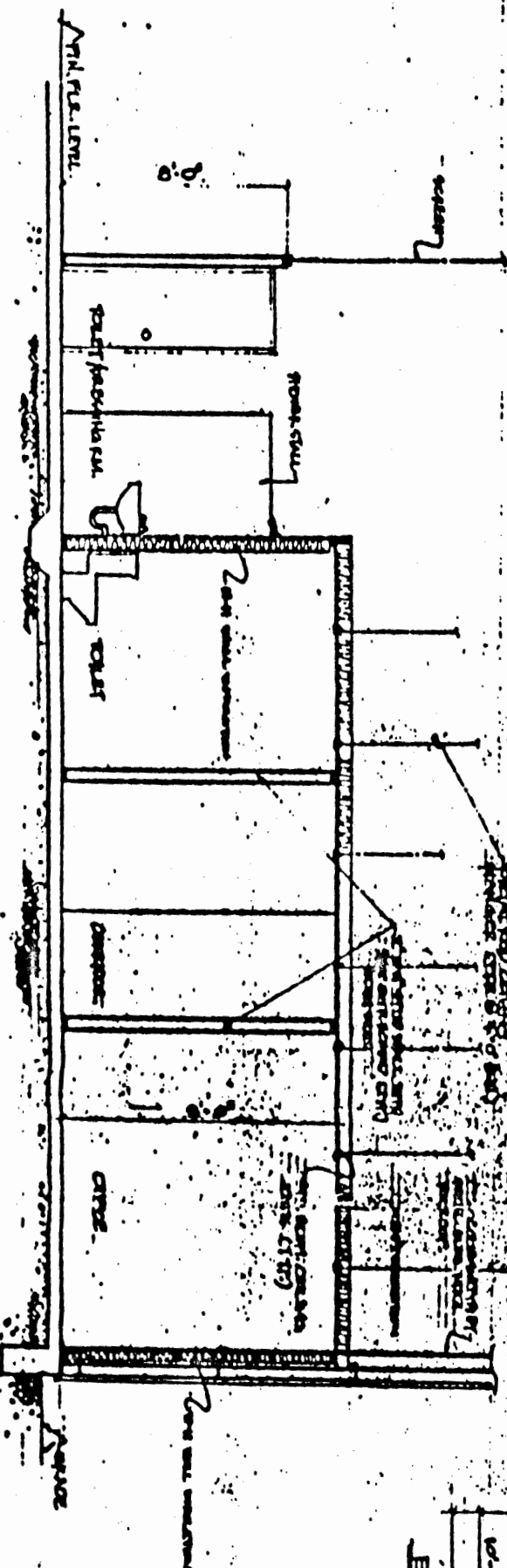
Section #			COMMENTS
H&S	CAC	40 CFR	
		262.21 23	As a transporter BAE has accepted manifests without EPA i.d. # for generator
		265.17b	Facility has a variance in permit allowing them to store within 50' from prop. line
		262.34 (a)(3)	No accumulation dates on labels from generators. BAE puts new label on drum when they are ready to ship out. Keep track of date they received the waste on paperwork in office but don't put <del>an</del> label on drum until ready to ship.
		265.16	Job title of Chemical Technician has same job responsibilities as Operator according to Don Oliva but operation plan only has job description for Operator. However Chemical Technician employed has received all appropriate training.
		<del>262.71</del>	
		253.42	BAE is currently corresponding with Board of Equalization to determine if they must pay generator disposal fees for remanifesting wastes.



SECTION (E)



REFLECTED CEILING PLAN  
SCALE: (OFFICE AREA) 1/8" = 1'-0"



ELEVATION (B)

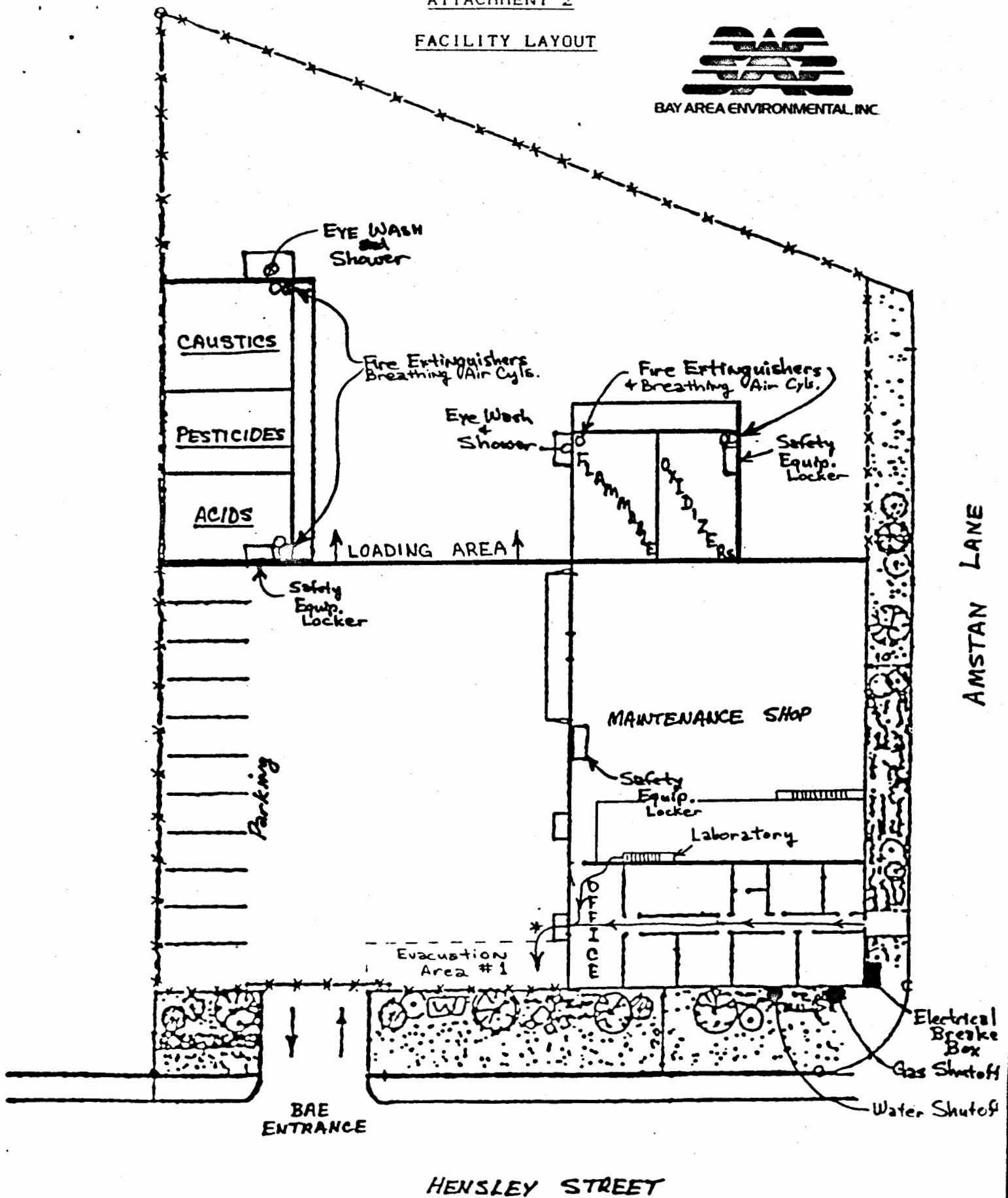
DRUM STORAGE SHED

ELEVATION (C)

J. J. MAGANA CO.	
ARCHITECT	ENGINEER
1000 N. 10th St.	1000 N. 10th St.
PHOENIX, ARIZ.	PHOENIX, ARIZ.
SHOP OFFICE BLDG.	
CEILING AND SECTION	

[illegible]

ATTACHMENT 2  
FACILITY LAYOUT



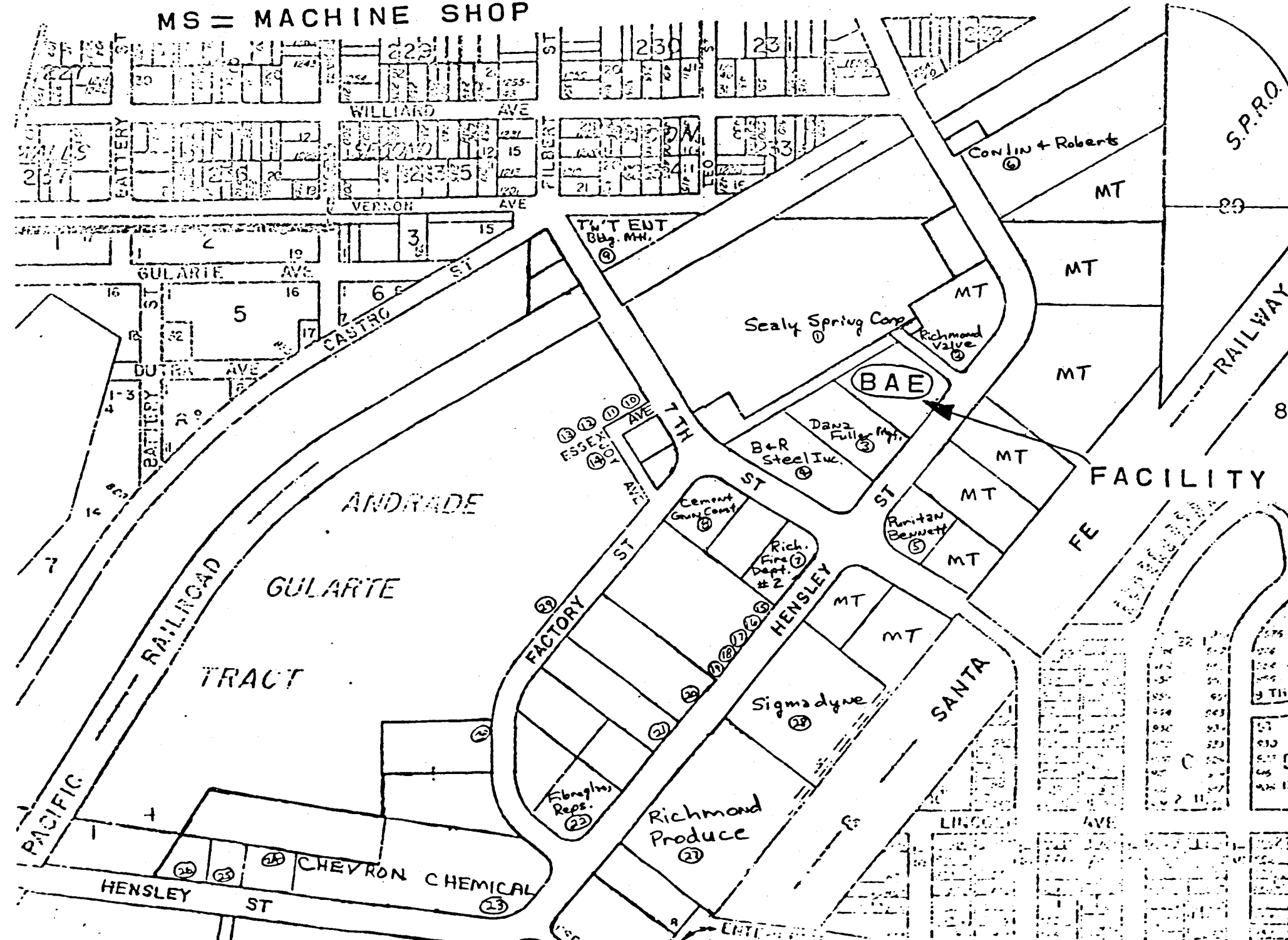
Evacuation  
Area  
#2

\* Primary Evacuation Route Is Out The Front Do  
Secondary Evacuation Route Is Out Back Doors.



WH = WAREHOUSE  
MT = EMPTY  
MS = MACHINE SHOP

SEE ACCOMPANYING LIST FOR  
NAMES, ADDRESSES, & PHONE NO.



ATTACHMENT 6

NEIGHBORING INDUSTRIES LIST  
(Keyed To Map By Number)

<u>NO.</u>	<u>NEIGHBORING INDUSTRY</u>	<u>ADDRESS</u>	<u>PHONE NO.</u>
------------	-----------------------------	----------------	------------------

NEIGHBORS LIKELY TO BE CONCERNED OR IMPACTED BY AN INCIDENT  
(Call and advise them of any threatening facility activity)

1.	SEALY SPRING CORP.	1183 HENSLEY	235-7171
2.	RICHMOND VALVES & FITTINGS	1151 HENSLEY	234-6370
3.	DANA FULLER MANUFACTURING	1111 HENSLEY	620-0330
4.	B & R STEEL INC.	1090 7TH.	232-8272
5.	PURITAN-BENNETT CORP.	1100 HENSLEY	234-8062
6.	CONLIN-ROBERTS	1208 HENSLEY	231-0555
7.	RICHMOND FIRE DEPT., STA. #2	1061 7TH	(911) 620-6591

NEIGHBORS UNLIKELY TO BE IMPACTED BY ANY FACILITY INCIDENT  
(No call should be needed for any conceivable incident)

8.	CEMENT GUN CONSTRUCTION INC.	1090 FACTORY	235-4100
9.	T'n'T ENT BUILDING MAT'LS.	1160 7TH.	233-2525
10.	DELTA COMPOSITION INC.	1099 7TH.	?
11.	U.C. PRINTING/U.C. PRESS	1093 ESSEX	642-6000
12.	CEMCEL	1091 ESSEX	235-9911
13.	CASCADE CONTINENTAL FOODS	1089 ESSEX	232-3103
14.	R. KURZ TRUCKING SERVICE	1085 ESSEX	?
15.	A.W. HANSEN	1071 HENSLEY	237-1652
16.	CHEVRON OIL PRODUCTS	1071 HENSLEY	new
17.	AFCO-FLEX	1067 HENSLEY	?
18.	KBC TOOLS	1067 HENSLEY	236-4437
19.	LUX CHEMICAL	1063 HENSLEY	232-5167
20.	CONCORD ENGINEERING	1045 HENSLEY	233-1613



21.	PROFESSIONAL FINISHING	1041 HENSLEY	236-7351
22.	FIBERGLASS REPS. INC.	1001 HENSLEY	234-3567
23.	CHEVRON CHEMICALS (ORTHO)	940 HENSLEY	231-8100
24.	GASKET ENGINEERING	953 HENSLEY	232-8880
25.	KELMAN INDUSTRIES	947 HENSLEY	233-1742
26.	DM CUSTOM	925 HENSLEY	232-1696
27.	RICHMOND PRODUCE	1010-1050 HENSLEY	222-8300
28.	SIGMADYNE	1060 HENSLEY	?
29.	BAY AREA DISTRIBUTING CO.	1061 FACTORY	232-8554
30.	NO. BAY PAPER & PACKAGING	1009 FACTORY	232-1200

OPERATIONAL PLAN  
Prepared by  
BAY AREA ENVIRONMENTAL  
for  
THE CALIFORNIA STATE DEPARTMENT  
OF  
HEALTH SERVICE  
(Hazardous Materials Section  
Berkeley, California)

*Robert Walther*  
4-14-83

First Plan Submitted, December 8, 1980

Revised Plan August 7, 1981  
Revised Plan October 10, 1982  
Revised Plan April 11, 1983

## STATE OF CALIFORNIA

REGIONAL WATER QUALITY CONTROL BOARD  
DEPARTMENT OF HEALTH SERVICES  
SOLID WASTE MANAGEMENT BOARD  
DEPARTMENT OF FORESTRY

# APPLICATION FOR FACILITY PERMIT/WASTE DISCHARGE

This form is to be used for filing a/an: (check all appropriate)

1. ☐ REPORT OF WASTE DISCHARGE  
(pursuant to Division 7 of the Surface Water Code)
2. ☒ APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT  
(pursuant to Health and Safety Code Section 25200)
3. ☐ APPLICATION FOR A SOLID WASTE FACILITIES PERMIT  
(pursuant to Government Code Section 60741.50)
4. ☐ APPLICATION FOR A RUBBISH DUMP PERMIT  
(pursuant to Public Resources Code Sections 4371-4375 and 4433)

## FOR OFFICE USE ONLY

Form 200 Rec'd

Fee (\$1000) (SMB)

Letter to Discharger

Report Rec'd

Effective Date

CDF Notified

CDHS No.

SWFB No.

## I. FACILITY

## A. NAME OF FACILITY

Bay Area Environmental

TELEPHONE #

(415) 235-9422

ADDRESS

ZIP CODE

1125 Hensley St., Richmond, CA 94804

## B. NAME OF LEGAL OWNER OF FACILITY

J.J. Magana Corporation

TELEPHONE #

(415) 235-9422

ADDRESS

ZIP CODE

P.O. Box 579, San Pablo, CA 94806

## C. NAME OF BUSINESS OPERATING FACILITY

J.J. Magana Corporation

TELEPHONE #

(415) 235-9422

ADDRESS

ZIP CODE

P.O. Box 579, San Pablo, CA 94806

## D. TYPE OF BUSINESS OPERATING FACILITY

☐ Sole Proprietorship☐ Partnership☒ Corporation☐ Government Agency

## E. NAME OF OWNER(S) OF BUSINESS OPERATING FACILITY

Jesus Magana &amp; Bill Wabbe

TELEPHONE #

( )

ADDRESS WHERE LEGAL NOTICE MAY BE SERVED

ZIP CODE

P.O. Box 579, San Pablo, CA 94806

## II. REASON FOR FILING

CHECK ALL APPROPRIATE:

A. ☒ New discharge or facilityB. ☐ Existing discharge or facilityC. ☐ Increase in quantity of dischargeD. ☐ Change in character of dischargeE. ☐ Change in place or method of disposalF. ☐ Change in design or operationG. ☐ Change in business operating facilityH. ☐ Enlargement of existing facilityI. ☐ Other (explain below)

## III. TYPE OF OPERATION

CHECK ALL APPROPRIATE:

A. ☒ Transfer stationB. ☐ Solid waste disposal siteC. ☒ Hazardous waste siteD. ☐ Sewage treatmentE. ☐ Industry (on-site disposal facility)F. ☐ Industry (discharge to sewer)G. ☐ Woodwaste siteH. ☐ Other (explain below)

## IV. TYPE OF WASTE

CHECK ALL APPROPRIATE:

A. ☐ Sewage, sewage sludge, and/orB. ☒ Industrial wastesC. ☐ Municipal solid wastesD. ☒ Hazardous wastesE. ☐ Agricultural wastesF. ☐ Animal wastesG. ☐ Forest product wastesH. ☐ Construction/demolition wastesI. ☐ Inert materialsJ. ☐ Dead animalsK. ☐ TiresL. ☐ Other (explain below)

## V. SITE DESIGN CAPACITY

A. PRESENT POPULATION OR CAPACITY

B. DESIGN POPULATION OR UTILITY CAPACITY

C. LIFE EXPECTANCY (YEARS)

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BAY AREA ENVIRONMENTAL

OPERATION PLAN

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OPERATION PLAN

BAY AREA ENVIRONMENTAL  
COLLECTION/TRANSFER STATION  
RICHMOND, CALIFORNIA

I. IDENTIFICATION OF FACILITY

Facility operator

Name: Bay Area Environmental  
Address: 1125 Hensley Street  
Richmond, CA 94804

Mailing Address:  
P.O. Box 579  
San Pablo, CA 94806

EPA ID# CAT 080014079

Name and Address J.J. Magana Corp.  
of owner: 1125 Hensley Street  
Richmond, CA 94804

Mailing Address:  
P.O. Box 579  
San Pablo, Ca 94806

Name of Person Bill Walbeh, President Mailing Address:  
Preparing the Plan (415) 235-9422 Same as above  
and contact:

SIC# 4213, 4214, 4226, 4783

— November 1981

The facility collects, receives and transfers containerized wastes from householders and small industrial establishments. Small containers and their contents are placed in 55 gallon drums. All containers are transferred to a Class 1 disposal site. If a waste can be economically recycled, the facility operator shall make every effort to do so. We have no on-site treatment disposal or injection wells. Drawing No. 1, 4, and 5 enclosed in the Appendix show the facility's layout. Drawing No. 5 shows the concrete slab design and dimensions. A wire mesh will be embedded in the concrete slab and in the berms.

The 5" slab will be structurally strong enough to support the drums and equipment without cracking. The sealant applied to concrete surfaces will be compatible with the waste stored on the surface, e.g., acid-proof sealant for acid storage area.

The storage area will be protected from rain by a corrugated metal roof and canvas doors. Rainwater will not collect in the storage area, because the storage area floor will be sloped for proper drainage so as to prevent the drums from standing in liquid.

The drums will be standing on pallets as well. Run-off from other areas cannot enter the storage area. The estimated storage capacity of each bermed area is 84 drums. Each bermed area will hold 20% of its container capacity. This is enough capacity to contain accidental spills. Both the storage of empty drums as well as the drum filling operation will be located on the concrete slab.

The traffic flow is as show on drawing No. 1. Five parking spaces are designated for household parking area. Fuel will not be store on site and maintenance will be done on site. A six foot chain link fence will be installed on the site's boundary. The surface of the vehеicles path will be asphalt. All other areas will have gravel surface.

Size and number of vehicles using the facility would be:

1/2 ton pick-up  
2 1/2 ton truck  
40' flat bed

twice a day  
once a week  
once a month

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this Operation Plan and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Bill Wahlberg, President  
Signature & Title

4-14-83  
Date:

## II. MAP OF FACILITY AND SURROUDINGS

The facility maps are in the appendix

Exhibit No. 1 shows that the property is located in a Heavy Industrial Zone. The flammables storage area is 40 ft. from the property line. The city of Richmond fire Department has granted a variance for this location. See the Department's letter in the appendix.

Exhibit No. 2 shows that the property is located in minimal flooding area.

Exhibit No. 3 Contra Costa Assessor's Map Book 561 page 29.

Exhibit No. 4 shows the industries located around the facility.

Exhibit No. 5 U S C S Map, Richmond Quadrangle

Exhibit No. 6 Legal description of the property

J. J. Magana drawings 1,3,4,and 5 show the drum storage area on the lot with the building specifications, and slab construction.

There is no earthquake fault that runs through the facility.

## III. GEOLOGY OF THE SITE

Not applicable to this facility, since it is a collection/transfer station and waste will not be stored on the facility. There is no earthquake fault that runs through the facility.

## IV. RELATIONSHIP OF THE FACILITY TO THE 100-YEAR FLOODPLAIN

The facility is located outside the 100-year floodplain as shown in exhibit No. 2.



V. CHARACTERISTICS OF HAZARDOUS WASTES HANDLED AT THE FACILITY.

- A. 1. Hazardous waste handled at the facility is defined in Section 261.33(a) through (f), Title 40 of the Federal Register.

The facility operator will serve homeowners and a wide range of small & medium sized industries located in Contra costa County. At this time it is difficult to predict the quantities and types of waste which would be handled at the facility.

B. Methods for Identification of Hazardous Wastes.

This facility will be accepting small volume, containerized Wastes from homeowners and wastes from small generators.

It is assumed that all waste handled on site is toxic and precautions will be taken in regard of protecting the facility's operators, by providing safety and protective clothes.

Ignitability will be tested using a gas sniffer.

pH measurement is an excellent indication of the reactivity or corrosivity of chemicals.

All containers received at the facility must be labeled in accordance to the Department of Transportation, regulations Title 49, and Title 22, Section 66535 g.

It is the generator's responsibility to identify the waste and furnish the waste analysis on the manifest.

Waste characterization will be limited to test:

- 1) pH-acid or alkaline solution.
- 2) Flammability - use a sniffer.
- 3) Reactivity with water.

VI. MAJOR WASTE MANAGEMENT DEVICES USED AT THE FACILITY.

The containers used for the storage of hazardous waste are 55 gallon drums.

The waste stored in the containers is compatible with the container's material of construction.

Leaky 55 gallon containers will be overpacked. Leaky and corroded containers which are less than 55 gallon will be placed in 55 gallon steel drums. Plastic liners will be used in the drum if the waste is not compatible with the steel.

All small containers and glass bottles will be packaged in 55 gallon/<sup>17 H</sup>drums. Vermiculite or other approved absorbent material will be used as needed to fill in between the containers.

All labeling will be in accordance to D.O.T. specifications as stated in Title CFR 49, and Title 22, Section 66535 g.

The drum storage area is covered and no precipitation is expected in this area.

The drums will be placed on pallets. The pallets will have rubber pads mounted at its end for floor surface protection.

Two foot aisle space is maintained for inspection between the drums.

2. Containment for the Drums Storage Area.

The drums are stored on a 5" concrete slab. One coat of paint is applied over the entire floor area. The paint is resistant to the chemicals stored on the slab. Construction details of this area are shown on drawing No. 5.

The concrete slab is divided into sections. Each section is contained within 6" high concrete berm, and slopes toward one end. The drums are mounted on pallets for protection from standing liquids.

## VII. FACILITY EQUIPMENT AND DEVICES

### A. Waste Handling Equipment

Small containers delivered to the Station will be handled manually. The Operator must wear the following protective clothing when handling hazardous waste:

Rubber Suit, Gloves, Boots, Hard Hat, Face Shield or Goggles.

A spark-proof forklift will be used to load, unload and handle the drums and pallets. Back-up waste handling equipment will be readily available.

### C. Safety Equipment

The following equipment will be provided at the Station:

1- Telephone

2- Protective Clothing:

Hard Hats

Rubber Suit, Gloves, Boots

Face Shield or Goggles

Respirators for different chemical fumes

Scott Air Pack- 30 minutes

Portable Eye Wash and Shower

First Aid Supplies

All safety equipment will be labeled and its location specified by signs and on drawing 1.

Fired extinguishers will be used for fire protection in the storage area as required by the Richmond Fire Department. One fire extinguisher will be kept in the office.

D. Security

A six-foot high chain link fence will be installed on the site's Perimeter. A 30 foot wide gate is provided at Hensley Street entrance. The public will not be allowed inside the storage area. Only Company qualified personnel are allowed in the storage area.

---

Warning Signs

Signs will be posted at all points of access to the facility and be legible for a distance of at least 25 feet. The English legend shall read:

"Caution-Hazardous Waste Storage Area-Unauthorized Person Keep Out". The Spanish legend shall read,

"Cuidado! Zona De Residuos Peligrosos Prohibida La Entrada. A Personas No Autorizadas". No smoking signs will be posted in the storage areas, and where flammable waste is handled.

NFPA signs will be used at the different areas.

Signs will be posted to direct the clients, who bring in the waste in their personal vehicles.

Each sign will read: "Do not remove containers from the vehicles, before checking with the facility's attendant."

The signs will be posted at: a) Facility Entrance  
b) Parking Lot Fence  
c) Office Door

E. Lighting

The facility will not operate during hours of darkness.

Flood lights are presently installed in the yard.

F. Water Supply

The city water is available on site, and will be use for eye was and shower. Bottled water will be inside the office for drinking.

VIII. OPERATIONAL PROCEDURE

Traffic flow and parking designations for homeowners and haulers are shown or DWG. No. 1, Homeowners will park in the area designated, then go to the office for the paper work. Signs will be posted to direct the clients, who bring in the waste in their personal vehicles.

Each sign will read: "Do not remove containers from the vehicles, before checking with the facility's attendant."

The signs will be posted at: a) Facility Entrance  
b) Parking Lot Fence  
c) Office Door

If the homeowner has a small container, it will be handled manually, if it is large, then it will be handled using a hand truck.

If the container is leaking, then a 5 gallon plastic bucket with cover will be used to enclose the leaky container. Five gallon steel bucket with cover will be used for flammables and solvents.

Unlabeled waste will not be tested or analyzed in the office area. The analytical bench will be located in the Oxidizers area, equipped, as specified in the operational plan.

The waste will be received from the homeowners and the operator will fill Form-1. After this step and preparing all paperwork and paying the fees, the homeowner involvement ends and he then returns to his car and leaves the facility. The facility operator is responsible for moving the containers to the appropriate waste area.

The facility will enforce the use of the manifest as outlined in 40 CFR section 264.76.

The following instructions will be given to other haulers regarding unloading methods:

- 1) Present paper work to the office.
- 2) The operator will check the manifest or the shipping papers and verify the load on the vehicle. Any discrepancies will be reported to HWMB.
- 3) Samples will be taken from the waste containers and analyzed by the operator. The driver has to wait until the results of the analysis are known.
- 4) The driver will be directed to proceed to the storage
- 5) Unloading will be done by the facility operator using the forlift. The truck driver must not leave the unloading. The operator will store each container in its designated area.
- 6) After unloading the driver picks up the receipt from the office and leaves the facility.

Extremely hazardous waste will be marked and noted in the monthly report.

If the containers received from the customer have labels on them, then this would suffice to indicate the manner in which the waste should be handle.

If the containers are not labeled then the following tests will be carried out on the bench in the oxidizers area:

1. PH - Use Litmus Paper
2. Volatility - Use Sniffer
3. Reactivity with Water - Use one drop of the waste in a beaker of water.

Samples will be taken using a pipet and beakers. The waste from small industrial establishments will be analyzed every time the waste is delivered to the facility.

After the waste is identified the container must be labeled.

A competent operator with an education in chemistry will check the wast when it is received.

All drums will be properly labeled according to DOT regulations.

Every truckload leaving the Station must be accompanied by a California Hazardous Waste Manifest. In addition to the California Hazardous Waste Manifest, an in-house Drum Manifest (Form-4), will accompany the drum shipment. Each container will have its receipt number marked on the outside.



"A Summary Sheet of Waste Received" (Form - 2.).

Control of Waste at the Facility

Waste will be stored in the facility in the proper area by category. Below is a list of these categories:

Acids

Oil

Alkaline

Pesticides

Flammables

Water Reactive

Small Gas Cylinders

Oxidizers

Each section will be contained within a concrete berm. Small containers will be placed in drums immediately after receipt and the water reactive waste will be stored with the alkaline or oily wastes. No more than 5 gallons of water reactive waste is allowed in the facility. Glass bottles will be placed carefully inside of containers. Chemically incompatible wastes will not be packed together in the same shipping containers. After the drum is filled, it will then be closed and labeled. Fillers will be used between containers. All operations will take place on the concrete floor. Spilled material will be removed by Vacuum trucks. Empty drums for packing smaller containers will be purchased. No drums will be emptied or washed on-site. 17 H drums will be used.

The storage area will be inspected daily. Observations will be recorded on Form - 5.

Weights or volumes of these wastes are not known at this time, but will be reported to the Department of Health Services (DOHS), Hazardous Materials Management Section, (HMM) through the manifest system.

The design storage capacity of the 30' x 20' area is 112 drums.

The EPA manual, "A method for Determining Hazardous Waste compatibility, "EPA - 600/2-80-076, will be used as a guide for packaging potential imcompatibles.

Small containers delivered to the Station will be handled manually. The Operator must wear the following protective clothing when handling hazardous waste: Rubber Suit, Gloves, Boots, Hard Hat, Face Shield or Goggles.

The protective clothing used on the facility would be of the disposal type and one time usage. Laundering of work clothes is not needed.

Two foot aisle space will be maintained in the storage area to allow for containers inspection by the operator.

Vehicles will not be washed off on the facility or in the storage area.

The operation of this facility does not require washing of vehicles. All waste will be containerized.

No smoking signs will be posted in the storage area and areas where flammable waste is handled.

The 55 Gallon leaky drums will be put in overpack drums immediately upon arrival to the facility. Containers less than 55 gallon capacity will put in 55 gallon drums immediately upon arrival to the facility. Steel drums will be used for alkaline solutions and steel lined drums for acidic waste. The drums will be closed at all times except when waste is added or removed.

The empty containers with hazardous waste will be handled as hazardous waste and will be subject to the same regulation. Containers or their liners will be compatible with the wastes contained, e.g. Acidic solution will be placed in plastic lined containers.

New and reclaimed drums will be used on the facility.

Containers that had waste in it will not be used with incompatible waste.

Rainwater that might enter the storage pad will be handled as a hazardous waste.

IX. PERSONNEL

A. Training Program

The facility personnel will complete a program of class room instruction, and on-the-job training. The training program is directed by a Professional Chemical Engineer experienced in the hazardous waste management.

New employees will not work unsupervised position until they have completed the training requirement. All personnel must complete this program within six months of their hiring date. There will be an annual review of the initial program.

Training records will be kept for each person throughout his or her employment and for three years after termination. One copy of these records will be kept in the personnel records.

No employee will be allowed to work unsupervised until he has successfully completed the training program.

Each employee will be given hand-outs covering the material discussed in the classroom. The references used are CFR 49, CFR 40, Titles 13, and 22 of California Administration Codes and Cal/OSHA.

Each employee is issued all necessary safety gear, safety glasses, hard hat, chemical gloves, etc., and is then taken on a plant tour showing him/her the location of all emergency equipment, first aid stations, emergency showers, electrical emergency shut-offs, fire prevention equipment, and the emergency telephone number list which is posted in a conspicuous place by each phone.

Each employee will be required to know the location of all emergency response equipment and will be tested on completion of lesson number one, and during the course of his tenure here he or she will receive in-plant training for fire prevention.

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### Lesson

- |   |  |
|---|--|
| 1 | Emergency Response in Event of Fire and explosion.           |
| 2 | Emergency Responce in Event of a Release of Hazardous Waste. |
| 3 | New Federal and State Rules.                                 |
| 4 | Manifesting a Hazardous Waste.                               |
| 5 | Labeling, Placarding and Marking of Hazardous Waste.         |
| 6 | Handling of Hazardous Waste and Facility Inspection.         |

## LESSON NO. 1

### EMERGENCY RESPONSE IN EVENT OF FIRE OR EXPLOSION

Classroom instruction time 1½ hours.  
Question and Answer session 15 minutes.  
Testing time 15 minutes.

Coverage: CFR 40-Sec. 264-56.

#### TOPICS DISCUSSED:

- A. Subpart D section 265.50 through CFR 40-265.57. Contingency Plan and Emergency Procedures.
  - 1. General discussion and coverage of subpart D.
- B. Overall coverage of types of fires and kinds of equipment pertaining to and relating to our facility operation.
  - I. Three types of fires are wood, electrical, and chemical.
    - A. Wood Fire
      - 1. To control: Use water to quench or cool fire.  
A dry powder chemical may also be used effectively.
    - B. Chemical Fire

Caused from vapor air mixtures over flammable liquids igniting.

      - 1. To control: Use dry chemical powder (preferred), also can use foam, vapor liquid, or water fog spray depending on circumstances.
    - C. Electrical Fire

Usually caused through short circulating or overloading on line, etc.

      - 1. To control: Use only non-conductive dry chemicals or carbon dioxide.

## II. Flammable Liquids:

### A. Flash Point

Created when lowest temperature that liquid reaches gives off enough vapors to ignite.

### B. Ignition Temperature

Temperature that a flammable vapor air mix will burn without ignition.

## III. Classification

- A. The classification (properly) of fire is of vital importance as it determines the way the fire must be put out.

## IV. Elements

- A. There are three elements needed to make a fire burn, they are:
  - 1. Heat or Flame - To stop a fire remove the heat or source of flame or spark.
  - 2. Fuel - To stop a fire remove the fuel.
  - 3. Oxygen - To stop a fire remove the oxygen or stop the reaction.

## V. Prevention

- A. An effective in-plant fire protection plan depends on two things, they are:
  - 1. Knowledgeable personnel.
  - 2. The correct and sufficient amount of fire fighting equipment (CFR 264.32).

#### VI. Instructions

- A. The proper way to use dry powder extinguishers.
- B. In the event of fire, take action as prescribed (CFR 40-264.56) in company emergency response program.
- C. Learn how and when to use intercom for emergency.
- D. Who to call? Fire Department first, or coordinator first?
- E. How to identify characteristics of fire and type and danger involved.
- F. What's involved? Drums, tanks, equipment, electricity, or flammables?
- G. Should emergency switches (electrical) be shut off?
- H. Is fire controllable or uncontrollable?
- I. What are the coordinator's duties?
- J. Orderly evacuation in case of fire.
- K. Caution on how and when to use water to fight fire.
- L. What to do if you have a victim.

#### IV. Coordinator

- A. Emergency coordinator will direct and assess the possible hazards to human health and life or environment and take needed steps to protect life and property, inform proper authorities, attempt to contain the fire, save property and records, call for evacuation. CFR 40-Sec. 264.55.



## LESSON NO. 2

### EMERGENCY RESPONSE IN EVENT OF A RELEASE OF HAZARDOUS WASTE

Classroom instruction time 1½ hours.

Question and answer session 15 minutes.

Testing time 15 minutes.

#### TOPICS DISCUSSED

General instructions covering CFR-40-264.16: Personnel Training. All employees are required to become familiar with and to learn the location of all in-plant emergency equipment. E.G., fire extinguishers, absorbent bags, eye wash, and shower, etc.

- I. Emergency procedure as programmed for our facility in the event of a spill or release of a hazardous substance.
  - A. Try to identify the character of the spill or release as instructed in lesson number one.
  - B. Identify the source, amount and real extent of release.
  - C. You must notify your emergency coordinator (via intercom if necessary) and your immediate supervisor.
  - D. Stand by with all necessary fire equipment in case of an ignition.
  - E. Suspend all operations until spill (as in case of a ruptured drum of flammables) is cleaned up and vapors have dissipated.
  - F. Don't allow spill to escape from paved area onto ground area, dike if necessary.
  - G. Don't allow any vehicle to operate in close proximity of spill (because of possible ignition) until cleaned up.
  - H. If ground has been contaminated follow CFR-40-264.56(g).
  - I. When clean-up is finished in regard to reporting if necessary refer to CFR 40-264.33.

### LESSON NO. 3

#### NEW FEDERAL AND STATE RULES

Classroom instructions.

Time 1½ hours.

Question and answer session 15 minutes.

Testing time 15 minutes.

#### TOPIC:

E.P.A. - Environmental Protection Agency CFR 40

D.O.T. - Department of Transportation CFR 49

D.O.H.S. - Department of Health Service - State of Calif.,  
and their new rules that apply to hazardous  
waste, Title 22.

#### A. Direct Impact - CFR 49, Sec. 172.205 (a).

1. No person may offer for transportation, transport, transfer, or deliver a hazardous waste, unless a hazardous waste manifest is prepared, signed, carried, and given as required of that person by this section.

#### B. Direct Impact - CFR 40, Sec. 262.12.

1. A generator must not treat, store, dispose of, transport or offer for transportation, hazardous waste without having received an E.P.A. identification number from the administrator.
2. A generator must not offer his hazardous waste to transporters, treatment, storage, or disposal facilities that have not received an identification number from E.P.A.

With the advent of R.C.R.A., (Resource Conservation and Recovery Act - Sec. 3001 through 3008), and the inception of E.P.A. (CFR 40 262 - new D.O.T. rules) we now have adequate tracking of hazardous waste. E.g. (a) identification numbers, (b) manifesting, (c) record keeping, (d) reporting, to give us "the cradle to the grave" tracking system, and any violation of the new rules can bring heavy penalties and fines. R.C.R.A. Sec. 3008.

LESSON NO. 4

**MANIFESTING A HAZARDOUS WASTE**

Classroom instruction time 1½ hours.  
Question and answer session 15 minutes.  
Testing time 30 minutes.

TOPICS DISCUSSED:

**Manifesting:**

- A. Generator
- B. Transporter
- C. T.S.D. Facility

Subpart B, CFR-40, Sec. 262.20 through 262.23, The Manifest.  
Title 22, Article 6, Sec. 66470, 66475, 66480, and 66485.

**Instruction covering:**

- A. Newly formulated E.P.A. rules and regulations that went into effect November 20, 1980 (CFR-40 262) and their effect, step-by-step explanation using the State of Calif. hazardous waste manifest as an example.
- B. Copies (filled in examples) of California new hazardous waste manifests were given to each one present. Also, a copy of hazardous waste labels that will be required on each drum of hazardous waste offered for transportation as per CFR Title 49 Sec. 172.304 and CFR 40 Sec. 262.32.
- C. Explained that all shipments of hazardous waste in bulk or drums must be accompanied from cradle to grave by a State of California hazardous waste manifest. Explained in detail as to how it should be filled in, by whom it should be signed, and that all four copies must be legible. Signatures should be full name (not initials) and legible.

E. Copies go to who and where?

#1 White copy, TSD facility.

#2 Green copy, Hauler.

#3 Yellow copy, Disposer.

#4 Pink copy, Generator.

F. Who has to fill out manifests? Anyone who transports or offers for transport any amount of hazardous waste.

G. Manifest is also a shipping document.

H. The new hazardous waste labels that must be on each drum and dated and filled out are in addition to and not separate from the previously existing D.O.T. rules and regulations regarding specified containers and correct labeling. We need to make sure we don't transport leakers, that they have proper gaskets, the bungs are tight and tops are clean and free from resin or oil.

I. The D.O.T. hazardous waste label "ORM-E" would be placed on all drums.

J. Empty drums will be picked up under CFR Title 49, Sec.173.29 on our regular packing slip or invoice, dirty drum to be on the hazardous waste manifest. Trucks will be placarded flammable if the empty drums last contained flammable liquid.

L. Customer must have a manifest for each type of hazardous waste we are to pick-up. Example:

- two drums, 50 gallons each, of F-005 Flammable liquid N.O.S.

- four drums, 50 gallons each, of D-001 Flammable liquid N.O.S.

- eight drums, 50 gallons each, of F-002 Solvent N.O.S.  
ORM-E<sub>1</sub>

M. Customer has been notified that for safe transportation drums of flammable hazardous waste should (because of vapor pressure) be filled to only 50 gallons maximum. The customer is responsible for holding drums for 24 hours before shipping to check for leaks.

- N. If there are discrepancies noted, such as wrong count, wrong label, leakers, bulged top or bottom, a drum labeled acid or caustic, or if it contains other material, do not change the manifest. The manifest can only be changed by the responsible party who signed it and the change must be initialed by him or her. Please call the office before taking any action. The manifest is also a shipping document.

LESSON NO. 5

**LABELING, PLACARDING AND MARKING  
OF HAZARDOUS WASTE**

Classroom instructions.

Time 1½ hours.

Question and answer session 15 minutes.

TOPICS AND AREA DISCUSSED:

**C. CFR 40 - Pretransportation requirements E.P.A. & D.O.T.  
Regulations.**

262.30 CFR 40 - Packaging CFR 49, Sec. 173.178.179.

262.31 CFR 40 - Labeling CFR 49, Sec. 172.334.

262.32 CFR 40 - Marking CFR 49, Sec. 172.101.

262.33 CFR 40 - Placarding CFR 49, Sec. 172.504.

262.34 CFR 40 - Accumulation Time.

265.173 CFR 40 - Leaking Package CFR 49, Sec. 177.854.

262.177 CFR 40 - Compatibility in storage.

261.6 CFR 40 - Hazardous Waste Label.

Class was instructed in all the above sections noting that E.P.A. rules are in addition to, and not separate from, D.O.T.'s rules and regulations and that whenever a city, county, or state regulation comes in conflict with federal regulations then most stringent rule shall apply.

## LESSON NO. 6

### HANDLING OF HAZARDOUS WASTE AND FACILITY INSPECTION

Classroom instruction time 1½ hours.

Question and answer session 15 minutes.

Testing time 15 minutes.

#### TOPICS DISCUSSED:

Storage of hazardous waste and use and management of subpart I CFR 40 265.170, CFR 265.171, 265.172, 265.173, 265.174, 265.176, 265.177, 265.190, and California Title 22, division 4.

Instructions are given in detail regarding the EPA's management Sec.

Class is instructed to make sure before receiving any hazardous waste that the transporter has obeyed all rules and regulations and that the containers, if brought in drums, were properly labeled with accumulation dates and labeled in accordance with D.O.T. regulations, with correct E.P.A. waste (hazardous) label on drum and that containers were in proper condition using the following steps:

1. Make sure manifest is in order.
2. Make sure labels on drums match the information on the manifest
3. If there is any discrepancy in count, so note on manifest before giving transporter his copy.
4. After unloading check all drums to see if they are in good condition or leaking. If needed, transfer the ones that don't comply.
5. Wear proper safety equipment e.g. approved chemical gloves, long sleeves, goggles or safety glasses, steel toed shoes, hard hat. All waste materials are considered toxic and hazardous and must be handled accordingly.
6. Before opening drums loosen bungs slowly to allow any pressure (air) to escape.
7. After removing bungs, use pH test tape to ascertain if any drum of material is either acid or caustic, (pH less than 7 is acidic. pH over 7 is alkaline.) Store drums in the corresponding area.

8. Obtain a sample of each unlabeled container of hazardous waste. Use the pipet to draw a sample. Empty the pipet into a beaker.
9. Use the gas sniffer to determine if the waste is flammable. Store flammables separate from other chemicals.
10. All samples must be returned to its container after analysis.
11. After sampling make sure all bungs have gaskets, tighten down bungs and let drums set on the concrete slab for 24 hours before stacking to see if any leak.
12. Stack drums in a safe manner according to catagory.
13. Make sure aisle ways and exits are kept clear throughout the storage area.
14. Observe all applicable general safety rules for forklifts.

#### INSPECTION SECTION

##### Hazardous Waste Storage Inspection

1. One person assigned to daily check on a walk through of all storage areas (keeping a record of inspection) to see if any containers are leaking or seeping and to report anything that needs correction.
2. A walk through once a week through the entire T.S.D. facility by a qualified person to inspect and identify any problem that might lead to (a) a release of hazardous waste, (b) a threat to human health, (c) a written report will be kept on file covering weekly inspection for the following:
  1. Malfunctions
  2. Deterioration
  3. Operator errors
  4. Containers

Noting on checklist inspection of containers, emergency equipment, alarm systems, safety equipment, fire fighting equipment, security locks, warning signs, etc.



1. Improper construction.
2. Leaks or corrosion.
3. Heat generation from incompatible waste.

## B. Employees

### Operator

Conducts the day-to-day operations under the direction of the Supervisor. One operator will always be present at the times when waste is received. Another operator will be available to run the site in case of illness etc.

#### The Operator is responsible for:

- Receiving waste from customers.
- Issuing receipts for waste received.
- Maintaining the records, the copies of receipts and the manifest documents for three years.
- Performing chemical analysis for waste identification.
- Packaging and labeling all containers.
- Site housekeeping and maintenance.
- Collecting disposal fees.
- Site security.
- Notifying management of unsafe and illegal practices by customers.
- Checking safety equipment daily and ensuring that it is in a working condition.
- Inspecting storage area daily and recording observations in log book.
- Supervising the loading and unloading operations.

#### OPERATORS QUALIFICATIONS

1. Knowledge of basic chemistry and the use of laboratory equipment.
2. Knowledge of use of Scott Air Pack.
3. Knowledge of the California Waste Hauler Manifest System.
4. Familiarity with Health and Safety Codes pertaining to the operation.
5. Knowledge in using hazardous waste text books and references.
6. Knowledge of the EPA's analytical procedures.

#### Manager

The manager is a registered chemical engineer who is responsible for training the Station's operator to carry out all appropriate functions at the facility including:

- Waste Identification
- Safety
- Proper Waste Handling
- Record Keeping

The manager's responsibility is to ensure that the operations are conducted in compliance with all applicable laws and regulations.

#### The Manager is responsible for:

- Compliance with local, state and federal regulations.
- Implementation of the operations plan as approved by D.O.H.S.

-The operator's training.

-Liason with regulatory agencies.

Supervisor

Reviews operations and interface emergency response situations, and evacuation plan.

Initial Supervisory personnel are:

1. Bill Wahbeh  
1125 Hensley  
Richmond, CA 94801  
(415) 235-9422-----24 hours answering, on-call  
service
2. J. Jesus Magana  
1125 Hensley  
Richmond, CA 94801  
(415) 235-9422-----24 hour answering, on-call  
service

The Supervisor is responsible for:

- The operator's performance.
- Monthly auditing of waste inventory.
- Providing back-up equipment and personnel.
- Scheduling manpower and working hours.
- Maintaining equipment.
- Handling all financial matters.
- Reviewing and interfacing in emergency response situations.

X. EMERGENCY PROCEDURES

CONTINGENCY PLAN

The services which would be needed in case of emergency during the site's operation are:

- a) Fire
- b) Ambulance for bodily injury
- c) Vacuum trucks for spills

None of the above emergencies would cause the facility's shut down except if it is required by law.

Bay Area Environmental will make its plans available to the local fire departments and emergency response agencies and familiarize them with facility's operations.

The hazardous waste volume and the facility's operation and size are so small that it would not represent a threat to the environment.

All emergencies will be handled immediately and reported to D.O.H.S. Telephone numbers of the fire department, ambulance, the closest hospital, DOHS, CRWQCB, BAAQMD, The insurance Co., Supervisors, Vacuum truck companies will be readily available in the office. If accidental discharge of hazardous waste occurs, the facility operator is responsible for clean-up the waste. Contaminated sorbants will be placed in containers for disposal at a Class 1 site. If a large quantity is discharged, Vacuum trucks will be used to remove the waste. Supervisors (see Section IX. Personnel) will be assigned primary responsibility for coordinating emergency response measures and evacuation plan.

Telephone numbers of the Richmond Fire Department, Richmond Police Department, Ambulance Service and the nearest hospital will be posted in the facility.

Emergency Response in event of fire or explosion

A. Wood Fire

1. To control: Use water to quench or cool fire.  
A dry powder chemical may also be used effectively.

## B. Chemical Fire

Caused from vapor air mixtures over flammable liquids igniting.

1. To control: Use dry chemical powder (preferred), also can use foam, vapor liquid, or water fog spray depending on circumstances.

## C. Electrical Fire

Usually caused through short circulating or overloading on line, etc.

1. To control: Use only non-conductive dry chemicals or carbon dioxide.

Dry chemicals extinguishers will be used for fire fighting. The number of fire extinguishers and its location will be determined by the local Fire Department. The facility operator must notify the Fire Department in case of fire.

1. Instruct unauthorized personnel to leave the facility.
2. Call the Emergency Coordinator.
3. Identify the source of fire. Determine what is involved. Tank, drum, or equipment?
4. Determine if the fire is controllable or uncontrollable. Call the Fire Department if the fire is uncontrollable. Use dry chemical fire extinguishers in case of controllable fires.
5. Disconnect electrical switches if required.
6. Do not use water if the waste is water reactive.
7. Use the Scott Air Pack when fighting the fire.
8. Stand up-wind from the smoke.

9. If the fire causes chain reaction of explosions, do not get near the area, and order everyone to evacuate the facility until the fire department arrives on site and resumes its responsibility.
10. Save all records for waste identification to help emergency services for treatment in case of injury.

Emergency procedure in the event of a spill or release of a hazardous substance.

- A. Try to identify the character of the spill or release as instructed in lesson number one.
- B. Identify the source, amount and real extent of release.
- C. You must notify your emergency coordinator (via intercom if necessary) and your immediate supervisor.
- D. Stand by with all necessary fire equipment in case of an ignition.
- E. Suspend all operations until spill (as in case of a ruptured drum of flammables) is cleaned up and vapors have dissipated.
- F. Don't allow spill to escape from paved area onto ground area, dike if necessary.
- G. Don't allow any vehicle to operate in close proximity of spill (because of possible ignition) until cleaned up.
- H. If ground has been contaminated follow CFR-40-264.56(g).
- I. When clean-up is finished in regard to reporting if necessary refer to CFR 40-264.33.



The location of emergency equipment is shown on Dwg. No. 1

Evacuation plan for Personnel

The proposed storage areas are 65' x 30', 20' x 30', and 20' x 30' and has open front without obstructions. During normal working hours, the operator will be in the office where the telephone is located. The office is 120 feet from the drum storage buildings.

During drum loading/unloading and container packaging the operator will be at the storage area with the truck or fork-lift driver. In case of an emergency, where site evacuation is necessary, the operator will direct all individuals to leave the site immediately, the operator will also stay in the office to implement and coordinate the evacuation and any emergency response. Since the amount of hazardous waste that would be stored in the facility is small, emergency situations should be controlled easily without endangering life or private property. The assembly area in case of evacuation, is located in the parking lot by the facility's entrance.

Emergency Coordinator

Bill Wahbeh. . . . .Primary  
3861 Brookdale Blvd.,  
Castro Valley, CA 94546  
H. (415) 886-8836  
B. (415) 235-5422. . . . . 24 hour service

Jesus Magana  
1529 Solitude Lane.  
Richmond, CA  
H. (415) 223-3893  
B. (415) 235-9422. . . . . 24 hour service

Telephone numbers of emergency agencies:

Richmond Police Department. . . . .233-1214  
Richmond Fire Department. . . . .233-5223  
Richmond Hospital. . . . . 234-2525  
Brookside Hospital . . . . . 237-7000  
Highway Patrol. . . . . Zenith 1-2000  
Office of Emergency Services. . . . .228-5000  
Department of Health Services. . . . . 540-2043  
Hazardous Waste Management Management Branch  
  
Cal OSHA. . . . .540-3030  
Cadillac Ambulance Service. . . . .234-3242  
Bill Wahbeh, 1st Coordinator. . . . .886-8836  
J. J. Magana, 2nd Coordinator. . . . . 223-3893

List of Emergency Equipment

Fire Extinguishers: For Chemical fires as required by Richmond Fire Department.

Eye Wash and Shower: Portable, its location as shown on the drawing.

Spill control: 36 BBL Vacuum trucks on site or 1 mile away. Communications with telephone and audible signal Decontamination equipment are not needed on the facility.

The back up waste handling is located in Chevron Refiner, which is one mile away from the facility. The trucks are radio dispatched and could be reached immediately.

When hazardous waste is being handled all personnel will carry alarm (air siren), which is accuated in case of emergency.

The facility manager is responsible to ensure that the contingency plan is kept up-to-date, and kept on file in the office.

In case of any incident requiring implementation of the contingency plan, the facility operator will submit a report to the Department of Health Services Hazardous Waste Management Branch. If an emergency could threaten health off-site the findings will be reported as stated in 40 CFR section 264.56. (d).

XI. ENVIRONMENTAL CONTROL PERMITS

To build and operate the facility the following permits will required:

1. State Department of Health Service Permit (Hazardous Materials Section)
2. A Building Permit
3. A Local Business License

The facility operator is responsible for securing all permits required for the facility's operation, and will comply with the following regulations:

1. State of California Administrative Code, Title 22, Division 4, Chapter 30.
2. Code of Federal Regulations - Title 49 Transportation.
3. Code of Federal Regulations - Title 40 Hazardous Waste.
4. Cal/OSHA - Safety and Health Standards.

XII. RECORDS & REPORTS

All forms used at the Station will be printed in triplicate and distributed as follows:

One copy of summary sheet to DOHS, HMM Section, Sacramento office.

One copy of summary sheet to the Disposal Site.

One copy of summary sheet kept at the Station.

Monthly reports will be submitted to DOHS, HMM Section indicating the following:

Number of drums shipped to Class - I Site (Form - 3)

Number of drums at the facility. (Form - 3)

Copies of the California Hazardous Waste Manifest.

Copies of Summary Sheet of Waste Received. (Form -2)

All accidents resulting in a hazard to public health, safety, domestic livestock or wildlife will be reported to DOHS immediately. A written inspection schedule and log will be kept at the facility for a minimum of three years. Copies of the contingency plan, evacuation plan, and job descriptions will be kept at the facility and submitted to all local and state agencies concerned.

**List Of Forms:**

Forms-1	Homeowners Waste Receipt
Forms-1a	Industrial Waste Receipt
Forms-2	Summary Sheet of Waste Received
Forms-3	Monthly Report
Forms-4	Drum Manifest Form
Form-5	Daily Inspection Sheet

Waste delivered by licensed haulers must be accompanied with California Waste Manifest.

The facility operator is considered a waste generator when he transfers the waste from the facility to a permitted disposal site. A waste hauler manifest must accompany the shipment from the facility to the disposal site.

An annual report will be submitted to the Department of Health Services, Hazardous Waste Management Branch as outlined in 40 CFR Section 264.75. A copy of the fee return submitted to the State Board of Equalization will be sent to HWMB along with the monthly report.

If the facility accepts any hazardous waste from an off-site source without an accompanying shipping paper, the operator will use the unmanifested waste report as outlined in 40 CFR Section 264.76.

Copies of all waste manifests and receipts are kept on site until the closure of the facility.

The location of each type of waste in the facility is shown on drawing's 4 & 5. The quantity of each waste at each location will be reported monthly on Form - 3. Summary reports of incidents will be prepared within 24 hours after the incident.

Reports will indicate the nature of the incident, its cause, contingency plan, implementation, and preventive measures to avoid future reoccurrence.

The results of inspections will be recorded on the Daily Inspection Form No. 5.

Receipt No. \_\_\_\_\_

Date \_\_\_\_\_

BAY AREA ENVIRONMENTAL  
RICHMOND - CALIFORNIA  
HOMEOWNERS WASTE RECEIPT

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_  
\_\_\_\_\_

TELEPHONE NUMBER \_\_\_\_\_

TYPE OF CONTAINER \_\_\_\_\_  
\_\_\_\_\_

VOLUME \_\_\_\_\_

COMPOSITION \_\_\_\_\_

HAZARDOUS PROPERTIES:

TOXIC \_\_\_\_\_ ACIDIC \_\_\_\_\_

CAUSTIC \_\_\_\_\_ REACTIVE \_\_\_\_\_

FLAMMABLE \_\_\_\_\_ OXIDIZER \_\_\_\_\_

RESULT OF ANALYSIS \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SIGNATURE \_\_\_\_\_

P= Indicates the hazardous property under which the waste  
is packed.

X= Indicates Hazardous Property.





BAY AREA ENVIRONMENTAL  
RICHMOND - CALIFORNIA

MONTHLY REPORT

Number of Drums Received at the Station \_\_\_\_\_

Number of Drums Shipped to Class 1 Site \_\_\_\_\_

Drums at the Station:

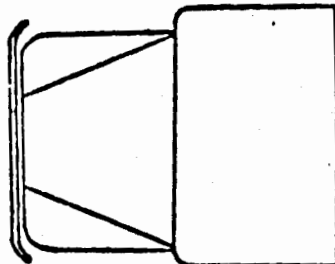
	<u>Size</u>	<u>Quantity</u>
Acid	_____	_____
Alkaline Solution	_____	_____
Pesticides	_____	_____
Paint Sludge	_____	_____
Solvents	_____	_____
Oil	_____	_____
Others	_____	_____

No. of California Hazardous Waste Manifest Attached: \_\_\_\_\_

No. of Receiving Forms Attached. \_\_\_\_\_

DATE \_\_\_\_\_

\_\_\_\_\_  
Signature



1	5	9	13	17	21	25	29	33	37	41	45	49	53	57	61	65	69	73	77
2	6	10	14	18	22	26	30	34	38	42	46	50	54	58	62	66	70	74	78
3	7	11	15	19	23	27	31	35	39	43	47	51	55	59	63	67	71	75	79
4	8	12	16	20	24	28	32	36	40	44	48	52	56	60	64	68	72	76	80

**DIRECTIONS:** Fill in the following blanks with a brief description of the contents of each drum that is on the load. The contents and location of the drum should correspond to the numbered locations as indicated on the above diagram.

1	_____	21	_____	41	_____	61	_____
2	_____	22	_____	42	_____	62	_____
3	_____	23	_____	43	_____	63	_____
4	_____	24	_____	44	_____	64	_____
5	_____	25	_____	45	_____	65	_____
6	_____	26	_____	46	_____	66	_____
7	_____	27	_____	47	_____	67	_____
8	_____	28	_____	48	_____	68	_____
9	_____	29	_____	49	_____	69	_____
10	_____	30	_____	50	_____	70	_____
11	_____	31	_____	51	_____	71	_____
12	_____	32	_____	52	_____	72	_____
13	_____	33	_____	53	_____	73	_____
14	_____	34	_____	54	_____	74	_____
15	_____	35	_____	55	_____	75	_____
16	_____	36	_____	56	_____	76	_____
17	_____	37	_____	57	_____	77	_____
18	_____	38	_____	58	_____	78	_____
19	_____	39	_____	59	_____	79	_____
20	_____	40	_____	60	_____	80	_____

GENERATOR: \_\_\_\_\_ By: \_\_\_\_\_ Date: \_\_\_\_\_

BAY AREA ENVIRONMENTAL  
RICHMOND TRANSFER STATION  
DAILY INSPECTION SHEET

1) Drum Storage Area  
Daily Inspection

Leaky Drums

Spillage

Cracks in:

- a. Floor
- b. Containment Structure
- c. Surface Coating
- d. Loading/Unloading

Flammable Waste	Oxidizer	H2O Reac- tive	Acids	Pesticides	Alkaline

2) Eye Wash & Shower

a) Leaks

b) Flow

3) Bell Alarm

a) Operation

4) Fire Extinguishers

a) Pressure

b) Capacity

5) Fence

a) Signs

6) Scott Air Pack

a) Pressure

b) Cleanliness of Face Shield

c) Regulator Setting

d) Hose

7) Forklift

a) Engine

b) Hydraulic System

8) EMERGENCY RESPONSE VEHICLE

a) Engine

b) Vacuum Pump

9) FENCE

a) Lock

b) Gate

c) Perimeter

Observations and Repairs-Nature & Date

Time \_\_\_\_\_ am  
pm

Inspector \_\_\_\_\_

Date \_\_\_\_\_

### XIII. CLOSURE PLAN

The steps necessary to close the facility are:  
All containers will be loaded and hauled away to an approved disposal site. All containers are movable and by removing it from the facility, no other waste material will be left in the facility except the storage area concrete slab. The concrete slab will have a sealant on the surface to prevent any waste material from penetrating through. If the concrete slab proved to be contaminated with waste, it will be broken up into pieces and hauled away in trucks to an approved disposal site. The facility is not the final destination for the waste containers, it is a transient collection/storage area. The facility users pay the cost of handling their waste from the generator's facility, to the collection/transfer station, to an approved disposal site, the cost included in the service fee and does not represent an additional cost for closure is \$3,000.00.

#### COST ESTIMATE

-- Disposal of 80 drums @ \$20/ drum	\$1,600.00
-- Transportation to Kettleman Hills Site 12 hours @ \$50.00/hr	600.00
-- Cleaning of concrete floor 2 men, 2 days @ \$10/hr	320.00
-- Equipment Rental, Steam cleaner	300.00
-- Disposal of pallets and contaminated rags	<u>180.00</u>
Total. . . . .	.\$3,000.00

Letter of credit will be submitted to the State Health Department, Hazardous Waste Branch as specified in Title 40, Sections 264.143 d. and 264.151 d.

XIV. FINANCIAL RESPONSIBILITY

The facility operator will provide a hazardous waste facility liability endorsement as required in title 40 Sections 264.147 and 264.151



DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM  
2151 BERKELEY WAY, ANNEX 9  
BERKELEY, CA 94704



## INSPECTION REPORT

CALIFORNIA ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION

1125 HENSLEY STREET

RICHMOND, CALIFORNIA 94801

EPA ID No. CAT 080014079

INSPECTED BY: Bonnie C. Griffith

DATE OF INSPECTION: February 28, 1991

DATE OF REPORT: March 28, 1991

I. PURPOSE: Conduct a transporter, land ban and facility inspection at a permitted non-major Resource Conservation Recovery Act (RCRA) transfer facility.

II. REPRESENTATIVES PRESENT:

**California Advanced Environmental Technology Corporation:**

Mark Kasper, Plant Manager  
Thomas Oakley, Facility Supervisor  
Dan Etheredge, Facility Operations Manager

**DHS/TSCP/Region 2:**

Bonnie C. Griffith, Associate Hazardous Materials Specialist  
Kwiyukwa K. Madoshi, Associate Hazardous Materials Specialist  
Salvatore Ciriello, Senior Waste Management Engineer  
David Tao, Waste Management Engineer

**Contra Costa County, Health Services Department:**

Eric Jonsson, Hazardous Materials Specialist

City of Richmond, Public Works Department:

Lynne Scarper, Industrial Waste Inspector

III. OWNER/OPERATOR

CAETC is owned by Advanced Environmental Technology Corporation (AETC), a hazardous waste management company, which is headquartered in New Jersey.

IV. BACKGROUND:

On October 5, 1990, AETC signed an agreement to acquire the assets of Bay Area Environmental, Inc. (BAE). The Department of Health Services (Department) as part of court settlement approved the transfer and sale of the BAE's Hazardous Waste Facility Permit (HWFP) to AETC. The formal transfer of ownership became effective on November 15, 1990. The facility is now known as California Advanced Environmental Technology Corporation (CAETC), with a sales office located in Hayward, California. AETC has handled, administered, and disposed of chemical wastes since 1976.

On January 7, 1991, CAETC submitted a revised Part A and Part B Permit Application for review by the Department's Facility Permitting Branch (Attachment Q). Until the Part A and Part B applications are approved by the Department, CAETC will operate in accordance with the permit issued on August 2, 1983 to BAE by the Department.

On January 23, 1991, the Department conducted an Enhanced Surveillance inspection of the facility. No violations were cited at this time.

The Extremely Hazardous Waste Permits (EHWP) issued to BAE are void; therefore, CAETC will have to apply to the Department for their own EHWP (Attachment R). Generators, having EHWP listing BAE as a designated facility, will be required to submit an amendment to the Department designating CAETC in place of BAE. The Department will date and initial the EHWP on file and send a copy of this permit to the generator. Until these amendments are approved by the Department, CAETC cannot accept Extremely Hazardous Waste from these generators.

V. GENERAL DESCRIPTION OF THE FACILITY:

CAETC is located in an industrial area of north-western Richmond on approximately one acre of land (Attachment V and W). The businesses in the immediate area include: Dana Fuller Company, Sealy Mattress Company and San Francisco Newspaper Agency (Attachment S). CAETC is a hazardous waste storage and transfer facility. The site has five permitted



hazardous waste storage bays: acids, pesticides, caustics, oxidizers, and flammables (Attachment V). The building adjacent to the flammables and oxidizers bays contains the warehouse, the laboratory and facility offices. The warehouse is used for storage of supplies, including empty containers, absorbent material, air cylinders to refill their self contained breathing apparatus (SCBA) and personal protective equipment supplies (eg. respirator cartridges, tyveks etc.).

VI. HAZARDOUS WASTE ACTIVITY DESCRIPTION:

CAETC does not package hazardous waste at the facility, except on household hazardous waste (HHHW) collection days, which are presently held once a month. Wastes received on HHHW days are packaged that day. Lab packs are done at the customer's location by a CAETC technician.

CAETC's current HWFP allows for the storage of 410 drums of hazardous waste:

o acid storage bay	-	84 drums
o toxic (pesticide) storage bay	-	84 drums
o caustic storage bay	-	105 drums
o flammable storage bay	-	53 drums
o oxidizer storage bay	-	84 drums
Total	=	410 drums

VII. OBSERVATIONS:

We arrived at the site at 0900 hours and met with Mark Kasper, Plant Manager, Thomas Oakley, Facility Supervisor, and Dan Etheredge, Facility Operations Manager. Ms. Griffith explained to Mr. Kasper that the purpose of our visit was to conduct the facility's Compliance Evaluation Inspection, including a walk through of the facility and a file review of the various plans required under their HWFP. Mr. Kasper agreed to the inspection. A short meeting was held in CAETC's conference room to discuss the inspection in more detail, during which Lynne Scarper, City of Richmond Public Works Department, joined us at 0910 hours.

During the meeting Salvatore Ciriello asked Mr. Kasper if CAETC had conducted any household hazardous wastes collection activities. Mr. Kasper said that the facility's first two HHHW collection days had been held on December 11 and 12, 1990. There have been two more HHHW collection days since December, 1990, one in January, 1991 and the other in February, 1991. These collections were mostly of solvents and other household liquid chemicals. The next collection day is scheduled for March 12, 1991. CAETC receives 100 to 200 phone calls a month relating to HHHW.

Mr. Kasper explained that CAETC does not package hazardous wastes at the facility. The Hayward office schedules a technician to go and review the waste at the customer's location. All the packaging is done at the customer's location by CAETC technicians. CAETC does not accept outside packaged wastes. They unpack and repack each container to verify the contents at the generator's site. The technician uses the field computer and packages the wastes accordingly. He then calls the Hayward office for a work order number and then contacts CAETC to verify the amount to be transported to the facility. CAETC puts its own markings on the containers to guarantee that these are the drums which have had Quality Assurance/Quality Control (QA/QC) done at the generator's site. When hazardous waste arrives at CAETC, Mr. Oakley checks the shipping documents and will not accept the load until it has been verified.

The only time CAETC does lab packing on site is on HHHW collection days. The packing is done on visquene. A rocon (fiber, Department of Transportation (DOT) 21 C) container is used. The person bringing in the HHHW must sign a receipt to certify that the waste is HHHW. HHHW is kept separate from all other packaged material. The HHHW is packed on that same day it is brought to the facility. HHHW is averaging about two 55-gallons drums per collection day.

Mr. Kasper explained that drilling muds, from the ground water monitoring conducted prior to the purchase of BAE by CAETC, were labeled and in the storage bays. The drums of drilling muds were observed in the caustics bay (Attachment P, Photo No. 8). Hazardous waste codes have been assigned to those drilling muds with waste analysis. CAETC will eventually send the drilling muds to Chem Waste Management at Kettleman Hills and has applied for disposal approval.

Mr. Kasper stated that several of their customers had requested CAETC to handle contaminated soil. Mr. Ciriello asked Mr. Kasper where most of CAETC's customers are located in California. Mr. Kasper said the majority of the customers are in the immediate Bay Area, but some are in northern and north eastern California.

The only hazardous waste currently being accepted at the facility is from emergency spill clean ups. H & H is the only transporter to bring in contaminated soil in drums to the facility. In this case, the material goes through CAETC's QA/QC before being accepted at the facility. A CAETC technician goes to the site to verify the manifest and contents before the hazardous waste is accepted at CAETC.

The transport route used by CAETC to go to and from its facility is the 880 Freeway via Castro Street to Hensley Street (Attachment W).

Recently, CAETC has been doing lab packing for the University of California, Berkeley (Attachment E) and Stanford University. CAETC will pack at a site for two to three days. On the last day, the load is shipped to CAETC, where Mr. Oakley is responsible for all incoming waste. It usually takes two hours to check each load that arrives at CAETC.

The facility inspection began at 0940 hours at the acids storage bay (Attachment P, Photo No. 6). The acids storage bay is located on the left as you enter the facility (Attachment V). It is one of three storage bays which opens to the north (Attachment P, Photo No. 17).

Ms. Griffith observed that the fence at the rear of the facility had been increased to 10 feet and redwood slates have been added for privacy (Attachment P, Photo No. 1). CAETC is planning on adding plastic curtains to each of the bays to keep out the rain. Mr. Kasper stated that installation of the curtains would be in four to six weeks (Attachment X). Eric Jonnson joined us during the facility inspection at 0945 hours. Various DOT approved fiber containers are being used by CAETC for packing wastes off site. These include one gallon (DOT 21C-60-S), four gallon (DOT 21C-60-L, 1.89 cubic feet (cf)) and 13 gallon (DOT 21C-1-15, 5.28 cf) fiber containers and one gallon wooden containers (DOT 21C-15-A), which are used for nitric acid. A total of 75 one-gallon containers or 36 4-gallon containers or 12 13-gallon containers can be stored per pallet. These containers are used, because they are more efficient and cost effective for getting the maximum load per ram in an incinerator. Mr. Ciriello confirmed that CAETC can store the above mentioned DOT containers at the facility.

Mr. Madoshi observed some rain water, approximately five to seven gallons, at the south west wall of the bay (Attachment P, Photo Nos. 3 and 4). Two pallets, but not hazardous wastes stored on them, came in contact with the water, approximately one-fourth inch high. Mr. Kasper later explained that absorbent is used to dry up the standing water in bays. Most of the acids in this bay were acetic acid. They were packaged in the fiber and wooden DOT approved containers. To make sorting easier CAETC technicians are currently writing the word acid on each of the containers.

A formula has been established by CAETC to determine the permitted storage capacity of each bay (Attachment K). It is used to calculate the number of "equivalent 55-gallon containers" for the various DOT containers recorded on inspection form. The number of containers did not exceed the storage capacity of the storage bays inspected.

Mr. Kasper explained that all incoming and outgoing loads are tracked on their computer. Packing slips were requested from each of the storage bays (Attachments A to F). The packing slip information includes the identification of the hazardous waste and hazardous waste codes, the container (job) number (eg. CA01040A/#38, CA17900 #1(com) (com indicates that there is more than one container in the job), the disposal site code (eg. ST18L10 is the code for an incinerator site, TWIV - 25815 is Trade Waste, a disposal facility), waste information profile (WIP) number and the accumulation start date. In addition, CAETC has a yellow label on each container meeting information requirements as specified under Title 22, California Code of Regulations, Sections 66504 and 66508 (Attachment U).

The area between the two buildings containing the hazardous waste storage bays has recently been resurfaced with asphalt (Attachment P, Photo Nos. 1, 11, 12, 17 and 18).

The pesticides bay contained a one-gallon partial full fiber container which was identified as containing HHHW by Mr. Kasper. This bay also contained mercuric chloride, the packing slip was in order (Attachment D). No commingling is done at the site.

The pesticides bay contained mostly zinc oxides, sulphur, and phosphate chemical compounds. The DOT containers observed in this bay included, 21C 1-15, 21C 60-L, 21C 60-S, and 17H 55-gallon drums (Attachment P, Photo No. 7).

The hazardous wastes in the caustics bay included poison reactives, drilling muds, spill clean-up wastes, contaminated soils and corrosives. The DOT containers included 21C-60-L, 21C-60-S, 17 H 55-gallon drums, and an 85-gallon overpack drum (Attachment P, Photo No. 8). Mr. Etheredge said that the contents of the 85-gallon overpack drum had not been determined.

Mr. Kasper stated that CAETC has purchased containment pallets to isolate potential incompatibles within the caustics bay, which should arrive within the next seven days. The evacuation plan was posted at both ends of the bays (Attachment P, Photo Nos. 6, 8 and 10). Also posted at storage bays is the carcinogen "report of use" form, which is a list of chemicals that can be stored in the bays. Mr. Kasper explained that persons, who are not CAETC employees, are required to sign an acknowledgement of presence of these chemicals, when they are going to be in the bays for a certain length of time.

There are four infrared detectors for security. Mr. Madoshi verified that the eyewash/shower at the end of the caustics bay was in working order (Attachment P, Photo No 9.)

Next we went to the northwest end of the facility to the storm drain valve. CAETC has removed and blinded the valve, as the culvert from this pipe drains directly into the street (Attachment P, Photo No. 13). CAETC has put an absorbent boom around this area so that no liquid drains on to the street (Attachment P, Photo Nos. 13 and 14). The boom is changed on a monthly basis. James Bell of CAETC handled the removal of the valve (Attachment Y).

The oxidizers and flammables bays are located on the northeast side of the facility and west of the warehouse and offices. During the inspection of these bays, Mr. Ciriello, Mr. Tao and Mr. Jonnson left the facility.

The hazardous wastes in the oxidizers bay were chemical compounds of peroxides. The DOT containers included a 30-gallon polyethylene drum, 21C-60-L, a five-gallon drum, 21C-60-S and ten-gallon black drums (Attachment P, Photo No. 15). A five-gallon DOT approved container was labeled BDT, which is the code for Battery Disposal Technology, another disposal site.

The flammables bay had three rows of hazardous wastes: 1) HHHW, mostly paint thinners, four 55-gallon drums, 2) combustibles, e.g. petroleum and vegetable oils, 11 55-gallon drums at the back of the flammables bay (Attachments B and P, Photo No. 16), 3) toxic (poisonous) flammables, e.g. cyanide and sulphide compounds, 15 55-gallon drums. The DOT containers included 10-gallon drums, 21C-60-S, 5-gallon drums and 17H 55-gallon drums. The emergency eyewash/shower adjacent to the flammables bay was in working order (Attachment P, Photo No. 20). The eyewash/showers are backed up by a portable eyewash/showers in case of a break down.

All bays appeared to be in order. Isle space was adequate for all bays. All fire extinguishers were in working order. Posted at each storage bay was a yellow sign reading "cancer-suspect authorized personnel only." (Attachment P, Photo Nos. 6, 7, 8, 15 and 20).

The warehouse is located next to the oxidizers and flammables bays (Attachment V). It is used for storage of fuels (e.g. kerosine, gasoline etc.) (Attachment P, Photo Nos. 21, 22 and 23). CAETC will be getting rid of the flammable product storage container in the near future (Attachment P, Photo No. 22). CAETC stores the forklift and other equipment in this area, including laboratory "virgin" chemicals and clean empty containers (Attachment P, Photo No. 21). The warehouse has six fire extinguishers which were in order.

The laboratory is above the administration offices, which are east and next to the warehouse. There was a ventilation hood and an emergency eyewash/shower, which were operational. The three fire extinguishers in the laboratory were in working order. The evacuation route was posted in the laboratory. Mr. Madoshi asked Mr. Kasper what CAETC was going to do with the laboratory. CAETC has two chemists who were taking an inventory of chemicals and laboratory apparatus left by the former facility, BAE. On the day of this inspection, Rob Lowell and Bruce Fritz of CAETC, of the Hayward facility, were meeting with a consultant to decide what to do with the laboratory. Mr. Kasper said CAETC plans are to eventually move the laboratory downstairs. CAETC has not accepted any samples for analysis. He said CAETC might use it as a certified environmental laboratory for chemical analyses. Mr. Madoshi checked all the chemical containers and they appeared to be properly labeled and sealed.

The fire extinguishers are checked once a month and the eyewash/showers are checked once a week. The wet laboratory, located downstairs, is inactive and CAETC has not decided what to do with it.

The file review began at 1300 hours. In the file room, we observed the following types of files:

1. Customer files, which contained the following information: incoming and outgoing manifests including names, address, day shipped, telephone numbers, EPA identification number, packing slip and toxic characterization certification form (TCCF).
2. Extremely Hazardous Waste Permit (EHWP) filed by customer.
3. Waste information profile (WIP) file, which is required for all transporters. WIP is for any bulk drum and is part of their waste analysis program. If a load does not have a WIP it is rejected by CAETC.
4. Incoming manifest file
5. Outgoing manifests file. Currently CAETC has only five manifests, all of which have gone to New Jersey (Attachment H).
6. Manifests to be mailed to generator.
7. Training files.
8. Daily inspection files.
9. Monthly inspection files.

10. Outgoing shipment and computer printout which are filed by manifest disposal site and shipments date. Currently, since wastes have been only shipped to New Jersey, there is only one file. CAETC will eventually have a separate file for each disposal site filed by manifest number and shipment date.

Manifests are sent to the Department at the end of each month. The generator manifests are usually sent back within three days.

The Financial Responsibility review done by the Department showed CAETC to be in compliance (Attachment O).

We reviewed the contingency plan and the list of emergency coordinators. The primary ER is Mr. Kasper, followed by Mr. Etheredge and Mr. Oakley (Attachment M). Mr. Kasper also produced the letters of agreement with Brookside Hospital, and the Richmond police and fire departments. The Richmond police and fire departments came to the site, and Mr. Kasper met with Brookside Hospital. Ms. Griffith mentioned that she had not received the list of names for ER for CAETC. This list had been submitted with CAETC's revised Part B (Attachment Q). Mr. Kasper stated that a letter would be sent with the ER changes (Attachments Z and CC). He retrieved all of the former BAE's contingency plans from the hospital and fire and police departments. Mr. Kasper had a copy of the old BAE contingency plan. CAETC has replaced the SCOTT air packs with MSA self containing breathing apparatus (Attachments Z and CC).

During the inspection we did not observe a means of internal communication (eg. telephones and sirens). Mr. Kasper stated that two-way radios had been ordered and would be arriving within a few weeks. Presently, CAETC uses a "buddy" system when employees are working in the bays. CAETC has a 24 hour emergency answering service. If the alarm goes off, the answering service contacts the police first, then the emergency coordinator, and then the fire department. Usually, the police will contact the fire department depending on the seriousness and the urgency of the situation prior to the arrival of the emergency coordinator.

We reviewed the daily inspection logs, which were in order (Attachments J and K). Mr. Kasper stated that inspections are done daily, weekly and monthly. The inspection log for 1/7/91 to 1/11/91 documented the broken pipes and the remedial action for their repair (Attachment J).

While inspecting the daily log sheets, we found that CAETC inspectors do not normally sign or write their names fully; instead they just put their initials down. Mr. Kasper,



asked if it was correct to sign the weekly inspection logs and date them, instead of doing that daily. We told him we would find out from our supervisor. Mr. Kasper said that the person in charge of the daily inspection at the Richmond facility is Mr. Oakley. When Mr. Oakley is away, Mr. Etheredge or Mr. Kasper does the inspections. Monthly inspections are done by a CAETC representative from the Hayward office using a standard AETC inspection form (Attachment L).

The notification for land ban hazardous wastes appeared to be in order for Manifest number 90621213, which also included the TCCF (Attachment G). Mr. Kasper, Mr. Etheredge, and Mr. Oakley are the three CAETC employees who can sign the hazardous waste manifest. All of the BAE manifests went with Mr. Jesus J. Magana after the sale of BAE to CAETC.

Mr. Kasper stated that it is the generator's responsibility to determine if the waste is hazardous. CAETC uses generator's knowledge, laboratory analysis and Material Safety Data Sheets (MSDS) to verify the type of hazardous waste to be handled.

Training for CAETC personnel was given by a CAETC industrial hygienist at AETC in New Jersey. Ms. Griffith asked to see the job descriptions. Mr. Kasper could not produce them; they were faxed to the facility from the Hayward office. In a subsequent phone call with Mr. Kasper, he stated that the job descriptions were at CAETC with the revised Part B, which had been submitted to the Department for approval (Attachment Z). If staff does not attend a training session in first part of year, they are required to take the training in the second half of the year.

The facility is currently receiving and transporting hazardous wastes for disposal. The hazardous waste is shipped to New Jersey and then sent for incineration to either Illinois or South Carolina. Since March 1, 1991, some hazardous waste drums at the facility have been going to a landfill. The facility's goal is to eventually use an incinerator located in Utah instead of shipping the waste to New Jersey for final disposal.

The vehicles used by CAETC for the transport of hazardous waste are now based out of the Hayward office, CAD 982497158 (Attachment G). CAETC has four licensed vehicles, one truck is usually at CAETC, Richmond so when a truck comes in, the CAETC technicians can go back to Hayward or the customer's location, while the load is being processed (Attachment T). The Transporter checklist was not done.



To conclude our inspection Mr. Kasper took us to CAETC's computer room. He explained that all of the facility's management data is entered into the computer at the end of each work day. The computer main terminal is at AETC in New Jersey. Mr. Etheredge has been trained by CAETC to be the main computer operator, and Mr. Oakley is his assistant.

Mr. Etheredge and Mr. Oakley demonstrated to us briefly how they gather, store and retrieve needed computer information. Mr. Kasper said their computer system makes it easier for CAETC to manage all their hazardous waste activities. Attachment I contains an example of the computer printout and the related manifests and packing slips which documents the computer's tracking capability.

The site inspection ended at 1630 hours.

#### VIII. VIOLATIONS:

1. Health & Safety Code (H&SC), Section 25202(a), Title 22, California Code of Regulations (Cal. Code Regs.), Section 66374 (a) and Hazardous Waste Facility Permit (HWFP), Part II (5) and Operation Plan (OP) VI.

CAETC, violated H&SC, Section 25202(a), Title 22, Cal. Code Regs., Section 66374 (a), HWFP, Part II (5) and OP VI, in that on or about February 28, 1991, CAETC packed household hazardous waste at its facility a one-gallon fiber container. The OP states that "all small containers and glass bottles will be packaged in 55-gallon, 17H drums".

Mr. Kasper identified and told Ms. Griffith that a one-gallon fiber container (DOT 21C-60L), labeled with the word "partial" on top of the container, held household hazardous waste. Ms. Griffith observed this container in the Pesticides Bay. Upon review of the facility's Operation Plan (OP), it was determined that all small containers of hazardous waste packaged at the facility must be put into 55-gallon 17H drums in accordance with their approved HWFP and OP.

2. Title 22, Cal. Code Regs., Section 67104 (d).

CAETC violated Title 22, Cal. Code Regs., Section 67104 (d), in that from January 7 to 11, 1991 and from February 25 to March 1, 1991, the daily inspection logs did not include the name of the inspector.

Attachments J and K included two of CAETC daily inspection logs. The initials T.O. were used instead of the full name of the person performing the inspection, Thomas Oakley.

IX. SAMPLING SUMMARY:

No samples were taken.

X. DISCUSSION WITH MANAGEMENT:

Mr. Madoshi and Ms. Griffith explained to Mr. Kasper that there were several potential violations. These included not having the job descriptions at the facility, using initials only on the inspection logs, and not conducting monthly inspections.

On March 1, 1991, Mr. Kasper stated that the job descriptions had been in his office at the time of the inspection in CAETC's revised Part B (Attachment Z). The first monthly inspection was conducted on January 7, 1991 by Bruce Fritz of CAETC's Hayward Office (Attachment Z). Mr. Kasper confirmed that inspections began on November 15, 1990, when CAETC took possession of the facility (Attachment Z). Based on this information violations pertaining to job descriptions and monthly reports will not be cited at this time.

Ms. Griffith told Mr. Kasper that she would verify if prior approval from the Department was required for the installation of the curtains to prevent the rain from entering the storage bays (Attachment Z). On March 12, 1991, Ms. Griffith told Mr. Kasper that the installation of the curtains was not a modification of their permit (Attachment Z).

Mr. Kasper was informed that the Annual Report for 1990 would not be required for submittal by the Department this year. In addition, Ms. Griffith requested that a letter identifying the names of the Emergency Coordinators be sent to the Department (Attachment Z).

In a letter, dated March 21, 1991, the Facility Permitting Branch, Region 2 responded to CAETC correspondence and a phone conversation from CAETC regarding compatibility groupings, the handling of HHHW and the handling of small quantity generators wastes (Attachments AA, BB and CC). The Department approved the compatibility groupings proposed in CAETC's letter, dated February 28, 1991, but did not approve the facility's proposal to handle small quantity generator wastes. In addition, the Department verified that consolidation of HHHW at the Richmond facility is acceptable, as long as it is done in the designated storage areas and the HHHW are packed into 55-gallon DOT approved containers.

XI. ATTACHMENTS:

Attachment A - CAETC Packing Slip incoming and outgoing for container number CA01040A/#38 - 2 pages.

Attachment B - CAETC Packing Slips incoming and outgoing for container number CA17900/#1 (com) - 2 pages.

Attachment C - CAETC Packing Slips incoming and outgoing for container number CA01051/#3 - 2 pages.

Attachment D - CAETC Packing Slip incoming for container number CA01040/#45 - 1 pages.

Attachment E - CAETC Packing Slips incoming and outgoing for container number CA01055/#2 - 2 pages.

Attachment F - CAETC Packing Slips incoming and outgoing for container number CA01061/#10 - 2 pages.

Attachment G - California Manifest number 90621223 with Land Ban Notification and Toxicity Characteristic Certification Form - 5 pages.

Attachment H - New Jersey Manifest number 1039510 Generator and TSD copy - 10 pages. .

Attachment I - Manifest number 90621233, shipping/receiving form, packing slip, waste information profile, and computer print out - 6 pages.

Attachment J - CAETC Daily Inspection Log for 1/7/91 to 1/11/91 - 1 page.

Attachment K - CAETC Daily Inspection Log and total number of gallons for 2/25/91 to 2/27/91 - 4 pages.

Attachment L - CAETC Monthly Inspection Log dated 2/12/91 - 8 pages.

Attachment M - CAETC draft organization chart - 1 page.

Attachment N - Checklists - 31 pages.

Attachment O - Financial Responsibility Review dated 1/3/91 - 1 page.

Attachment P - Department of Health Services Photographs of CAETC taken on 2/28/91 - pages.

Attachment Q - Letter of Submittal for the Part A and B Permit Application dated 1/3/91 - 1 page.

Attachment R - Record of Communication to David Tao, Department of Health Services and Bonnie Griffith, Department of Health Services dated 1/22/91 - 1 page.

Attachment S - Attachment 6 - Businesses Within One Quarter Mile of the CAETC Richmond Facility (from CAETC's Contingency Plan and Emergency Procedures) - 2 pages.

Attachment T - Record of Communication to Patricia Browitt, Department of Health Services from Bonnie C. Griffith, Department of Health Services dated 1/18/91 - 1 page.

Attachment U - CAETC label for hazardous waste information requirements - 1 page.

Attachment V - Attachment 5 - Location of Facility/Emergency Equipment (from CAETC's Contingency Plan and Emergency Procedures) - 4 pages.

Attachment W - Location Map - 1 page.

Attachment X - B&N Enterprises' Plans for curtains to be installed at CAETC - 5 pages.

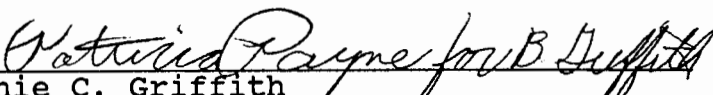
Attachment Y - Record of Communication between Lynn Scarper, City of Richmond and Bonnie C. Griffith, Department of Health Services dated 3/7/91 and 3/13/91 - 2 pages.

Attachment Z - Record of Communication between Mark Kasper, CAETC and Bonnie C. Griffith, Department of Health Services dated 3/12/91 - 1 page.

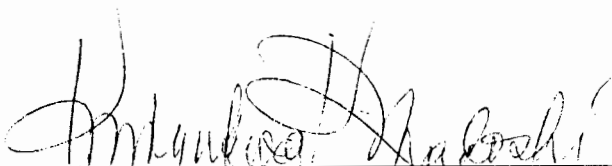
Attachment AA - Record of Communication Between Ken McKeveny, CAETC, New Jersey and Bonnie C. Griffith, Department of Health Services dated 3/12/91 - 1 page.


Attachment BB - Letter dated March 21, 1991 from the Department of Health Services to James Bell, CAETC - 2 pages.

Attachment CC - Letter dated March 20, 1991 from James Bell, CAETC to the Department of Health Services (enclosure not included) - 2 pages.

  
Bonnie C. Griffith  
Associate Hazardous Materials Specialist  
Region 2  
Surveillance and Enforcement Branch

3/28/91  
Date Submitted

  
Kwiyukwa K. Madoshi  
Associate Hazardous Materials Specialist  
Region 2  
Surveillance and Enforcement Branch

  
Patricia C. Payne  
Unit Chief  
Region 2  
Surveillance and Enforcement Branch

3/28/91  
Date Approved



ORIGINAL







INITIAL 

ATTACHMENT B





PACININU SERI

CALIFORNIA ADVANCED ENVIRONMENTAL  
TECHNOLOGY CORPORATION

15 HENSLEY STREET, RICHMOND, CALIFORNIA 94801

E 17 ACCUMULATED 2-8-91

**CAT 080014079**

2-8-91  
DATE SHIPPED

CA01051 # 3  
CONTAINER #

NON RCRA HAZARDOUS WASTE SOLID

D.O.T. Non-Regulated

DOT PROPER SHIPPING NAME — HAZARD CLASS

NAME  
UN/NA

SFOK 91181

127902

DISPOSAL CODE

W.I.P. #

D.O.T. 34-53

GROUP

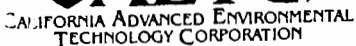
## COMMON DRUMS

EPA CODE

CONTAINER TYPE

Om

LPMI	CANISTER SIZE	NET WEIGHT	CHEMICAL NAME	PAGE	OF	WASTE TYPE
1	SSGA	Solid	Ridoline containing; Trisodium phosphate Sodium Tetra borate Butyl cellosolve Monoethanolamine Calcium Silicate Inert Fillers	10-30 % 15-30 % 2-10 % 1-10 % ~10% 10-20%		14/ none
		TOTAL NET WEIGHT	400#	AUC	B	



# 3

2-8-91  
DATE ACCUMULATED

7-8-91  
DATE SHIPPED

CA 01051  
CONTAINER #

CTRA-physics  
P.O. Box 7013  
MT. VIEW CT. 94039

NON RCRA HAZARDOUS WASTE SOLID

D.T.T. non-Regulated

DOT PROPER SHIPPING NAME — HAZARD CLASS

None  
UN/NA

GENERATOR - ADDRESS - EPA # 14A009138488

906 21242

PG/LINE.

SFOK-91181

127902

DISPOSAL CODE

W.I.P. #



191

## COMMON DRUGS

EPA CODE

W.I.P. #	GROUP
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95	95
96	96
97	97
98	98
99	99
100	100

55 GAL DR in 85 GAL O.P.  
CONTAINER TYPE (DM)

CONTAINER TYPE

Om

TOTAL NET  
WEIGHT

400<sup>+</sup>

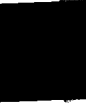
Atty  
TECHNICAL SUPERVISOR

INITIAL

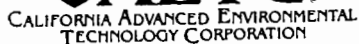


INITIAL









# PACKING SLIP

DATE ACCUMULATED

DATE SHIPPED \_\_\_\_\_

CONTAINER #

CAD061 62 6692

GENERATOR — ADDRESS — EPA #

90621322

## MANIFEST

PG/LINE 1D

OXIDIZER

NA 9193

DOT PROPER SHIPPING NAME — HAZARD CLASS

UN/NA

767 DTP

130088

DISPOSAL CODE

W.I.P. #

1

I / DDD /

## COMMON DRUGS

EPA CODE

34-30 DF

GROUP

369A1

CONTAINER TYPE

[illegible]TOTAL NET  
WEIGHT

24016

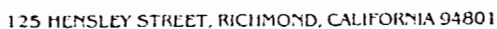
Allen Kroll

TECHNICAL SUPERVISOR

TZ

INITIAL



[illegible]

CA01061 10

CONTAINER #

080014079

WASTE CORROSIVE LIQUID, NOS

CORROSIVE MATERIAL

UN1760

DOT PROPER SHIPPING NAME — HAZARD CLASS

UN/NA

ST000000075

A

DISPOSAL CODE

W.I.P. #

GROUP

1

C/D002

21C115DF

COMMON DRUGS	EPA CODE
--------------	----------

CONTAINER TYPE

5.28 cf

[illegible]

ATTACHMENT F

Allen

TECHNICAL SUPERVISOR

INITIAL

RM #W-15C.3



RED



2/15/91

CA01061 10

DATE ACCUMULATED

DATE SHIPPED

CONTAINER #

1 DUBLIN BLVD  
DUBLIN CA 94545

CAD000056069

GENERATOR — ADDRESS — EPA #

90621243

MANIFEST

PG/LINE

WASTE CORROSIVE LIQUID, NOS

CORROSIVE MATERIAL

UN1760

DOT PROPER SHIPPING NAME — HAZARD CLASS

UN/NA

ST000000075

A

DISPOSAL CODE

W.I.P. #

GROUP

1

C/D002

21C115DF

## COMMON DRUGS

EPA CODE

CONTAINER TYPE

5.28 cf

UNIT	CONTAINER SIZE	NET WEIGHT	CHEMICAL NAME	Page 1 of 1	WASTE TYPE
1	1 gal		PHOSPHORIC ACID WITH CITRIC ACID 2% 10 % TOTAL SOLUTION		D002 551
3	half lb		SILICA		551
1	1 lb		MOLECULAR SIEVES		551
1	2 lbs		MAGNESIUM CARBONATE		551
1	1 lb		ZINC OXIDE		551
1	2 lbs		EPOXY RESIN FILLERS		551
2	2 lbs		EPOXY RESIN FILLERS		551
1	1 lb		CALCIUM SULFATE		551
2	1 lb		EPOXY RESIN FILLER		551
2	1 lb		EPOXY RESIN FILLER		551
1	1 lb		EPOXY RESIN FILLER		551
10	half lb		EPOXY RESIN FILLER		551
1	1/4 lb		ZINC OXIDE		551
TOTAL NET WEIGHT		115 lb	Allen		

TOTAL NET  
WEIGHT

115 1b

Allen

## TECHNICAL SUPERVISOR

INITIAL



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address ABN Holographics 80 E. San Francisco Drake Blvd. Larkspur, CA 94039		4. Generator's Phone (415) 961-8194		A. State Manifest Document Number 90621213	
5. Transporter 1 Company Name California AETC		6. US EPA ID Number ICAD19824971158		B. State Generator's ID BOE EXEMPT	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID 107411-48424	
9. Designated Facility Name and Site Address California AETC 1125 Hensley St. Richmond CA 94801		10. US EPA ID Number ICAT108100114079		D. Transporter's Phone 415 7827003	
				E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID CA110181010114079	
				H. Facility's Phone 415 233800	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. Waste Flammable Liquid, nos. Flammable Liquid UN1993			0013 DIF	0192315	P
b. Waste Oxidizer, nos. Oxidizer UN1479			001 DIF	000130	P
c. Waste Nitric Acid (over 40%) Oxidizer UN2031			001 DIF	0101030	P
d. Waste Corrosive Liquid, nos. Corrosive Material UN1760			0101 DIF	000960	P
J. Additional Descriptions for Materials Listed Above a, b, c, d: Pack Lab Chemicals S/L, S/L, S/L, S/L a also exhibits 0001, 0018 characteristics c also exhibits 0002 characteristics			K. Handling Codes for Wastes Listed Above a. 14/07 b. 14/07 c. 14/07 d. 14/07		
15. Special Handling Instructions and Additional Information EH Permit # 2-12985 Packing slips attached for clarification of material					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name JOSEPH STANISCI		Signature Joseph Stanisci		Month Day 11/22/11	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name Stephen F. Leland		Signature Stephen F. Leland		Month Day 11/22/11	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name THOMAS OARLEY		Signature Thomas Oarley		Month Day 11/22/11	



EPA Form 8700-204-100

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains wastes restricted from land disposal by the USEPA under the land disposal program. The waste or residue from the treatment of these wastes is restricted from land disposal unless the waste is below the applicable treatment standards.

Generator ABN Holographics Manifest# 90621213

Waste analysis data is/is not attached. (Circle One)

Solvent/California List Landfill Ban

The shipment contains an F001-F005 spent solvent and/or a California listed material specified on the Table CCWE 40 CFR 268.41 or 40 CFR 268.32 or RCRA Section 3004(d).

F001 \_\_\_\_\_ F002 \_\_\_\_\_ F003 \_\_\_\_\_ F004 \_\_\_\_\_ F005 \_\_\_\_\_

MATERIAL		WASTEWATER (mg/l)	OTHER (mg/kg)
( ) W ( ) N	Acetone	0.05	0.59
( ) W ( ) N	Benzene	0.07	3.7
( ) W ( ) N	n-Butyl Alcohol	5.0	5.0
( ) W ( ) N	Carbon Disulfide	1.05	4.81
( ) W ( ) N	Carbon Tetrachloride	.05	0.96
( ) W ( ) N	Chlorobenzene	.15	0.05
( ) W ( ) N	Cresols (and cresylic acid)	2.82	0.75
( ) W ( ) N	Cyclohexanone	.125	0.75
( ) W ( ) N	1,2 dichlorobenzene	.65	0.125
( ) W ( ) N	Ethyl Acetate	.05	0.75
( ) W ( ) N	Ethyl Benzene	.05	0.053
( ) W ( ) N	Ethyl Ether	.05	0.75
( ) W ( ) N	Isobutanol	5.0	5.0
( ) W ( ) N	Methanol	.25	0.75
( ) W ( ) N	Methylene Chloride	.20	0.96
( ) W ( ) N	Methylene Chloride (Pharm. Industry)	0.44	0.96
( ) W ( ) N	Methyl Ethyl Ketone	0.05	0.75
( ) W ( ) N	Methyl Isobutyl Ketone	0.05	0.33
( ) W ( ) N	Nitrobenzene	0.66	0.125
( ) W ( ) N	Pyridine	1.12	0.33
( ) W ( ) N	Tetrachloroethylene	0.079	0.05
( ) W ( ) N	Toluene	1.12	0.33
( ) W ( ) N	1,1,1-Trichloroethane	1.05	0.41
( ) W ( ) N	1,1,2-Trichloroethane	0.03	7.6
( ) W ( ) N	1,1,2-Trichloro- 1,2,2-trifluoroethane	1.05	0.96
( ) W ( ) N	Trichloroethylene	0.062	0.091
( ) W ( ) N	Trichlorofluoromethane	0.05	0.96
( ) W ( ) N	Xylene	0.05	0.15

Manifest Line #

The material is a liquid RCRA waste containing greater than 50 ppm PCB's.

The material is a characteristic waste containing greater than 1000 ppm HOC's (other than D012-D017).

The material is a characteristic liquid waste containing greater than 134 mg/l of nickel (Ni).

The material is a characteristic liquid waste containing greater than 130 mg/l of thallium (Tl).

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Lab Packs (Packed Under Organometallic Lab Pack Exemptions)**

This shipment contains lab packs as defined in 40 CFR 264.316 and 265.316 that contain only the organometallic hazardous wastes specified in 40 CFR 268.42 Appendix IV. The EPA hazardous waste codes are listed on the appropriate pack slips. The method of treatment for these Appendix IV materials is incineration. The numbers listed below represent the container numbers with Appendix IV material being shipped on this manifest.

CA 010 33 #3, #2, #1, #8, #4, #11, #7, #6, #10, #5

I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only waste codes specified in Appendix A to part 268 or solid wastes not subject to this regulation under Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

Signature: [Signature] Date: 12/21/90

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains wastes restricted from land disposal by the USEPA under the land disposal restrictions program. The following wastes or residues from the treatment of these wastes is restricted from land disposal unless the waste is treated in accordance with the technology-based standards as defined in 40 CFR 268.42. The following key is utilized to reflect the technology used for the following waste types.

Generator ABN Holdings Graphic

Manifest # 90621213

Waste Analysis data is/ls not attached. (Circle One)

A. INCIN B. CHOXD OR INCIN C. STABL	D. CHOXD, CHRED or INCIN E. PSUBS, CHOXD, CHRED or INCIN F. RMETL or RTHRM	G. RTHRM or STABL H. ADGAS to NEUTR or NEUTR I. RMERC	J. IMERC K. PSUBS, RORGS or INCIN L. RTHRM	M. RLEAD N. PSUBS or INCIN O. CHOXD, WETOX or INCIN	P. ADGAS to NEUTR Q. ADGAS R. IMERC or RMERC S. DEACT
<input checked="" type="checkbox"/> D001 (> 10% TOC)(K)	<input type="checkbox"/> P041 (N)	<input type="checkbox"/> P092 (Hi Hg Residue)(T)	<input type="checkbox"/> U035 (A)	<input type="checkbox"/> U116 (A)	<input type="checkbox"/> U193 (A)
<input checked="" type="checkbox"/> D001 (other)(S)	<input type="checkbox"/> P042 (A)	<input type="checkbox"/> P093 (A)	<input type="checkbox"/> U038 (A)	<input type="checkbox"/> U119 (A)	<input type="checkbox"/> U194 (A)
<input type="checkbox"/> D002 (S)	<input type="checkbox"/> P043 (N)	<input type="checkbox"/> P095 (A)	<input type="checkbox"/> U041 (A)	<input type="checkbox"/> U122 (N)	<input type="checkbox"/> U197 (N)
<input type="checkbox"/> D003 (S)	<input type="checkbox"/> P044 (N)	<input type="checkbox"/> P096 (D)	<input type="checkbox"/> U042 (A)	<input type="checkbox"/> U123 (N)	<input type="checkbox"/> U200 (A)
<input type="checkbox"/> D006 (Batteries)(L)	<input type="checkbox"/> P045 (A)	<input type="checkbox"/> P102 (N)	<input type="checkbox"/> U046 (A)	<input type="checkbox"/> U124 (N)	<input type="checkbox"/> U201 (N)
<input type="checkbox"/> D008 (Acid Bat.)(M)	<input type="checkbox"/> P046 (A)	<input type="checkbox"/> P105 (E)	<input type="checkbox"/> U049 (A)	<input type="checkbox"/> U125 (N)	<input type="checkbox"/> U202 (A)
<input type="checkbox"/> D009 (Hi Hg - NIR ORG)(R)	<input type="checkbox"/> P047 (Salts/ Esters)(A)	<input type="checkbox"/> P108 (A)	<input type="checkbox"/> U053 (N)	<input type="checkbox"/> U126 (N)	<input type="checkbox"/> U206 (A)
<input type="checkbox"/> D009 (Hi Hg - INORG)(I)	<input type="checkbox"/> P049 (A)	<input type="checkbox"/> P109 (N)	<input type="checkbox"/> U055 (N)	<input type="checkbox"/> U132 (A)	<input type="checkbox"/> U213 (N)
<input type="checkbox"/> P005 (2 Nitro)(A)	<input type="checkbox"/> P054 (A)	<input type="checkbox"/> P111 (A)	<input type="checkbox"/> U056 (N)	<input type="checkbox"/> U133 (E)	<input type="checkbox"/> U214 (G)
<input type="checkbox"/> P005 (2 Eth Et)(A)	<input type="checkbox"/> P056 (P)	<input type="checkbox"/> P112 (E)	<input type="checkbox"/> U057 (N)	<input type="checkbox"/> U134 (H)	<input type="checkbox"/> U215 (G)
<input type="checkbox"/> P001 (N)	<input type="checkbox"/> P057 (A)	<input type="checkbox"/> P113 (G)	<input type="checkbox"/> U058 (N)	<input type="checkbox"/> U135 (D)	<input type="checkbox"/> U216 (G)
<input type="checkbox"/> P002 (A)	<input type="checkbox"/> P058 (A)	<input type="checkbox"/> P115 (G)	<input type="checkbox"/> U059 (A)	<input type="checkbox"/> U143 (A)	<input type="checkbox"/> U217 (G)
<input type="checkbox"/> P003 (N)	<input type="checkbox"/> P062 (N)	<input type="checkbox"/> P116 (A)	<input type="checkbox"/> U062 (A)	<input type="checkbox"/> U147 (N)	<input type="checkbox"/> U218 (A)
<input type="checkbox"/> P005 (N)	<input type="checkbox"/> P064 (A)	<input type="checkbox"/> P118 (A)	<input type="checkbox"/> U064 (N)	<input type="checkbox"/> U148 (A)	<input type="checkbox"/> U219 (A)
<input type="checkbox"/> P006 (D)	<input type="checkbox"/> P065 (Hi Hg - Residues)(T)	<input type="checkbox"/> P119 (C)	<input type="checkbox"/> U073 (A)	<input type="checkbox"/> U149 (A)	<input type="checkbox"/> U221 (N)
<input type="checkbox"/> P007 (A)	<input type="checkbox"/> P065 (NIR from RMERC)(J)	<input type="checkbox"/> P120 (C)	<input type="checkbox"/> U074 (A)	<input type="checkbox"/> U150 (A)	<input type="checkbox"/> U222 (A)
<input type="checkbox"/> P008 (A)	<input type="checkbox"/> P066 (A)	<input type="checkbox"/> P122 (D)	<input type="checkbox"/> U085 (N)	<input type="checkbox"/> U151 (Hi Hg)(T)	<input type="checkbox"/> U223 (N)
<input type="checkbox"/> P009 (E)	<input type="checkbox"/> P067 (A)	<input type="checkbox"/> U001 (N)	<input type="checkbox"/> U086 (E)	<input type="checkbox"/> U153 (A)	<input type="checkbox"/> U234 (A)
<input type="checkbox"/> P014 (A)	<input type="checkbox"/> P068 (E)	<input type="checkbox"/> U003 (A)	<input type="checkbox"/> U087 (N)	<input type="checkbox"/> U154 (N)	<input type="checkbox"/> U236 (A)
<input type="checkbox"/> P015 (F)	<input type="checkbox"/> P069 (A)	<input type="checkbox"/> U006 (A)	<input type="checkbox"/> U089 (N)	<input type="checkbox"/> U156 (A)	<input type="checkbox"/> U237 (A)
<input type="checkbox"/> P016 (A)	<input type="checkbox"/> P070 (A)	<input type="checkbox"/> U007 (A)	<input type="checkbox"/> U090 (N)	<input type="checkbox"/> U160 (E)	<input type="checkbox"/> U238 (A)
<input type="checkbox"/> P017 (A)	<input type="checkbox"/> P072 (A)	<input type="checkbox"/> U008 (N)	<input type="checkbox"/> U091 (A)	<input type="checkbox"/> U163 (A)	<input type="checkbox"/> U240 (Salts/ Esters)(A)
<input type="checkbox"/> P018 (A)	<input type="checkbox"/> P075 (A)	<input type="checkbox"/> U010 (A)	<input type="checkbox"/> U092 (A)	<input type="checkbox"/> U164 (A)	<input type="checkbox"/> U244 (A)
<input type="checkbox"/> P022 (A)	<input type="checkbox"/> P076 (Q)	<input type="checkbox"/> U011 (A)	<input type="checkbox"/> U093 (A)	<input type="checkbox"/> U166 (N)	<input type="checkbox"/> U246 (O)
<input type="checkbox"/> P023 (A)	<input type="checkbox"/> P078 (O)	<input type="checkbox"/> U014 (A)	<input type="checkbox"/> U094 (N)	<input type="checkbox"/> U167 (A)	<input type="checkbox"/> U248 (N)
<input type="checkbox"/> P026 (A)	<input type="checkbox"/> P081 (E)	<input type="checkbox"/> U015 (A)	<input type="checkbox"/> U095 (A)	<input type="checkbox"/> U168 (A)	<input type="checkbox"/> U249 (D)
<input type="checkbox"/> P027 (A)	<input type="checkbox"/> P082 (A)	<input type="checkbox"/> U016 (N)	<input type="checkbox"/> U096 (E)	<input type="checkbox"/> U171 (A)	
<input type="checkbox"/> P028 (A)	<input type="checkbox"/> P084 (A)	<input type="checkbox"/> U017 (A)	<input type="checkbox"/> U097 (A)	<input type="checkbox"/> U173 (A)	
<input type="checkbox"/> P031 (O)	<input type="checkbox"/> P085 (N)	<input type="checkbox"/> U020 (A)	<input type="checkbox"/> U098 (E)	<input type="checkbox"/> U176 (A)	
<input type="checkbox"/> P033 (O)	<input type="checkbox"/> P087 (F)	<input type="checkbox"/> U021 (A)	<input type="checkbox"/> U099 (E)	<input type="checkbox"/> U177 (A)	
<input type="checkbox"/> P034 (A)	<input type="checkbox"/> P088 (N)	<input type="checkbox"/> U023 (E)	<input type="checkbox"/> U103 (E)	<input type="checkbox"/> U178 (A)	
<input type="checkbox"/> P040 (N)	<input type="checkbox"/> P092 (NIR from RMERC)(R)	<input type="checkbox"/> U026 (A)	<input type="checkbox"/> U109 (E)	<input type="checkbox"/> U182 (N)	
		<input type="checkbox"/> U033 (A)	<input type="checkbox"/> U110 (A)	<input type="checkbox"/> U184 (A)	
		<input type="checkbox"/> U034 (A)	<input type="checkbox"/> U113 (N)	<input type="checkbox"/> U186 (N)	
			<input type="checkbox"/> U114 (A)	<input type="checkbox"/> U189 (D)	
			<input type="checkbox"/> U115 (B)	<input type="checkbox"/> U191 (A)	

*Joseph Stawis*

Date 12-21-90

12/21/90

## TOXICITY CHARACTERISTIC CERTIFICATION FORM

Generator: ABN HolographicWaste Information Profile (WIP) Number: PCC

Based on knowledge of the wastestream or analysis that has been conducted, this wastestream contains the following organic constituents at or above the regulatory concentrations:

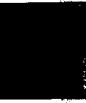
<u>EPA HW Number</u>	<u>Contaminant</u>	<u>Regulatory Level (mg/l)</u>
<input checked="" type="checkbox"/> D018	Benzene	0.5
<input type="checkbox"/> D019	Carbon tetrachloride	0.5
<input type="checkbox"/> D020	Chlordane	0.03
<input type="checkbox"/> D021	Chlorobenzene	100.0
<input type="checkbox"/> D022	Chloroform	6.0
<input type="checkbox"/> D023	o-Cresol	200.0
<input type="checkbox"/> D024	m-Cresol	200.0
<input type="checkbox"/> D025	p-Cresol	200.0
<input type="checkbox"/> D026	Cresol	200.0
<input type="checkbox"/> D027	1,4-Dichlorobenzene	7.5
<input type="checkbox"/> D028	1,2-Dichloroethane	0.5
<input type="checkbox"/> D029	1,1-Dichloroethylene	0.7
<input type="checkbox"/> D030	2,4-Dinitrotoluene	0.13
<input type="checkbox"/> D031	Heptachlor (and its hydroxide)	0.003
<input type="checkbox"/> D032	Hexachlorobenzene	0.13
<input type="checkbox"/> D033	Hexachloro-1, 3-butadiene	0.5
<input type="checkbox"/> D034	Hexachloroethane	3.0
<input type="checkbox"/> D035	Methyl ethyl ketone	200.0
<input type="checkbox"/> D036	Nitrobenzene	2.0
<input type="checkbox"/> D037	Pentachlorophenol	100.0
<input type="checkbox"/> D038	Pyridine	5.0
<input checked="" type="checkbox"/> D039	Tetrachloroethylene	0.7
<input checked="" type="checkbox"/> D040	Trichloroethylene	0.5
<input type="checkbox"/> D041	2,4,5-Trichlorophenol	400.0
<input type="checkbox"/> D042	2,4,6-Trichlorophenol	2.0
<input type="checkbox"/> D043	Vinyl chloride	0.2

☐ Waste does not contain any of the above organic toxicity characteristic constituents in excess of the indicated regulatory levels.

I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that submitted information is true, accurate and complete to the best of my knowledge and ability and that all known and suspected hazards have been disclosed.

Joseph Stanisci  
Signature  
JOSEPH STANISCI  
Name (print or type)

914-592-8860  
Phone  
Plant Mgr  
Title





State of New Jersey  
Department of Environmental Protection  
Division of Hazardous Waste Management  
Manifest Section  
CN 028, Trenton, NJ 08625

01/26/95

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS  
WASTE MANIFEST

1. Generator's US EPA ID No. 1114119 Manifest Document No. 1039510

2. Page 1 of 3 Information in the shaded areas is not required by Federal law.

## 3. Generator's Name and Mailing Address

CALIFORNIA AEC  
1125 WHEATLEY STREET, RIVERSIDE, CA 92501

## 4. Generator's Phone (415) 233-4661

## 5. Transporter 1 Company Name

BOTTLED TRUCK LEASING INC.

## 6. US EPA ID Number

41 D 0 P P P P P P P P

## 7. Transporter 2 Company Name

## 8. US EPA ID Number

1114119

## 9. Designated Facility Name and Site Address

ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION  
1 EDEN LANE  
FLANDERS NJ 07636

## 10. US EPA ID Number

1114119

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)  
HM12. Containers  
No. Type13. Total  
Quantity14. Unit  
Wt/Vol

15. Waste No.

## a. WASTE POISON B LIQUID, NOS

(ANILINE, PHENOL)

POISON B  
UN2810

2001

15

15

15

15

0100

## b. WASTE POISON B LIQUID, NOS

(CARBON ACETATE, PHENOL)

POISON B  
UN2810

2001

15

15

15

15

0105

## c. WASTE POISON B LIQUID, NOS

(PERCAPTETHANAL, METHYL IODIDE)

POISON B  
UN2810

2001

15

15

15

15

0111

## d. WASTE POISON B LIQUID, NOS

(METHYL IODIDE, DIAMINO BENZIDINE)

POISON B  
UN2810

2001

15

15

15

15

0106

## J. Additional Descriptions for Materials Listed Above

S/T PLC

S/T PLC

## K. Handling Codes for Wastes Listed Above

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

S/T PLC

S/T PLC

a. b. c. d.

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

ATTACHMENT H

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)		21. Generator's US EPA ID No. <b>CAT080014079</b>	Manifest Document No. <b>A1039510</b>	22. Page <b>2 of 5</b>	Information in the shaded areas is not required by Federal law.	
23. Generator's Name <b>CALIFORNIA AETC</b> <b>1125 HENSLEY STREET, RICHMOND, CA 94801</b> <b>(201) 347-1909</b>				L. State Manifest Document Number <b>NJA1039510</b>		
				M. State Generator's ID <b>SAME NJDOTS</b>		
24. Transporter 1 Company Name <b>SUTTLES TRUCK LEASING INC</b>		25. US EPA ID Number <b>ALD095704011</b>		N. State Trans ID <b>937 60065</b>		
26. Transporter 2 Company Name		27. US EPA ID Number		O. Trans. Phone <b>(205) 289-0670</b>		
				P. State Trans. ID		
				Q. Trans. Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers	30. Total Quantity	31. Unit Wt/Vol
				No.	Type	R. Waste No.
HM	a.	<input checked="" type="checkbox"/> WASTE POISON B LIQUID, NOS (METHYL IODIDE, MERCAPTOETHANOL)	POISON B UN2810	0001	DF	000115 P D011
	b.	<input checked="" type="checkbox"/> WASTE POISON B LIQUID, NOS (METHYL IODIDE, PHENYL ARSONIC ACID)	POISON B UN2810	0001	DF	000115 P D004
	c.	<input checked="" type="checkbox"/> WASTE POISON B LIQUID, NOS (PHENOL, ANILINE)	POISON B UN2810	0001	DF	000115 P U188
	d.	<input checked="" type="checkbox"/> WASTE POISON B LIQUID, NOS (PHENOL, DIBROMOETHANOL)	POISON B UN2810	0001	DF	000115 P U188
	e.	<input checked="" type="checkbox"/> WASTE POISON B LIQUID, NOS (PHENOL, MERCAPTOETHANOL)	POISON B UN2810	0001	DF	000115 P U188
	f.	<input checked="" type="checkbox"/> WASTE POISON B LIQUID, NOS (PHENOL, 1,4-NAPHTHOQUINONE)	POISON B UN2810	0001	DF	000115 P U188
	g.	<input checked="" type="checkbox"/> WASTE POISON B LIQUID, NOS (THIOREA, PHENOL)	POISON B UN2810	0001	DF	000115 P D022
	h.	<input checked="" type="checkbox"/> WASTE POISON B LIQUID, NOS (VANADIUM, BARIUM CHLORIDE)	POISON B UN2810	0001	DF	000115 P D005
	i.	<input checked="" type="checkbox"/> WASTE POISON B LIQUID, NOS (1,2-DIBROMOETHANE, PHENOL)	POISON B UN2810	0001	DF	000115 P U197
S. Additional Descriptions for Materials Listed Above <b>A,B) S/E PLC</b> <b>C,D) S/T PLC</b> <b>E,F,I) S/T PLC</b> <b>G,H) S/E PLC</b>				T. Handling Codes for Wastes Listed Above		
32. Special Handling Instructions and Additional Information <b>PACKING SLIPS ATTACHED FOR CLARIFICATION (TRANSIT ONLY)</b>						
TRANSPORTER	33. Transporter 1 Acknowledgement of Receipt of Materials			Date		
	Printed/Typed Name <b>G. Boyd Jackson</b>			Signature <i>G. Boyd Jackson</i>		Month Day Year <b>01/23/91</b>
ACILITY	34. Transporter 2 Acknowledgement of Receipt of Materials			Date		
	Printed/Typed Name			Signature		Month Day Year
35. Discrepancy Indication Space						



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)		21. Generator's US EPA ID No. <b>CAT000014079</b>	Manifest Document No. <b>A1039510</b>		22. Page <b>3 of 5</b>	Information in the shaded areas is not required by Federal law.			
23. Generator's Name <b>ALIFORNIA AETC</b> <b>1125 HENSLEY STREET, RICHMOND, CA 94801</b> <b>(201) 347-1909</b>					L. State Manifest Document Number <b>NJA1039510</b>				
24. Transporter 1 Company Name <b>SUTILES TRUCK LEASING INC</b>					25. US EPA ID Number <b>ALD095704011</b>				
26. Transporter 2 Company Name					27. US EPA ID Number				
					N. State Trans. ID <b>60065</b>				
					O. Trans. Phone <b>(205) 289-0670</b>				
					P. State Trans. ID				
					Q. Trans. Phone				
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					29. Containers	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.	
					No.	Type			
a.	HM	WASTE POISON B SOLID, NOS		POISON B	0001	DF	000115	P	D005
	X	(AMMONIUM VANADATE, BARIUM CHLORIDE)		UN2811					
b.	X	WASTE POISON B SOLID, NOS		POISON B	0001	DF	000115	P	D005
	X	(BARIUM CHLORIDE)		UN2811					
c.	X	WASTE POISON B SOLID, NOS		POISON B	0001	DF	000115	P	D005
	X	(BARIUM CHLORIDE, BARIUM SULFIDE)		UN2811					
d.	X	WASTE POISON B SOLID, NOS		POISON B	0001	DF	000115	P	D005
	X	(BARIUM CHLORIDE, CADMIUM CHLORIDE)		UN2811					
e.	X	WASTE POISON B SOLID, NOS		POISON B	0001	DF	000115	P	D005
	X	(BARIUM CHLORIDE, CADMIUM SULFATE)		UN2811					
f.	X	WASTE POISON B SOLID, NOS		POISON B	0001	DF	000115	P	D004
	X	(LACODYLIC ACID, THIUREA)		UN2811					
g.	X	WASTE POISON B SOLID, NOS		POISON B	0002	DF	000230	P	U188
	X	(PHENOL, THIUREA)		UN2811					
h.	X	WASTE POISON B SOLID, NOS		POISON B	0001	DF	000115	P	D004
	X	(SODIUM ARSENATE)		UN2811					
i.	X	WASTE POISON B SOLID, NOS		POISON B	0001	DF	000115	P	U219
	X	(THIUREA, THIOPHENOL)		UN2811					
S. Additional Descriptions for Materials Listed Above <b>A-D) S/E PLC</b>  <b>E,F,H) S/E PLC</b> <b>G,I) S/T PLC</b>					T. Handling Codes for Wastes Listed Above				
32. Special Handling Instructions and Additional Information <b>PACKING SLIPS ATTACHED FOR CLARIFICATION (TRANSIT ONLY)</b>									
TRANSPORTER	33. Transporter 1 Acknowledgement of Receipt of Materials				Date				
	Printed/Typed Name <b>G. Boyd Jackson</b>				Signature <b>G. Boyd Jackson</b>		Month Day Year <b>01/23/91</b>		
FACILITY	34. Transporter 2 Acknowledgement of Receipt of Materials				Date				
	Printed/Typed Name				Signature		Month Day Year		
35. Discrepancy Indication Space									



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)		21. Generator's US EPA ID No. <b>CAT000014079</b>	Manifest Document No. <b>A1039510</b>	22. Page <b>4 of 5</b>	Information in the shaded areas is not required by Federal law.				
23. Generator's Name <b>ALIFORNIA AETC</b> <b>1125 HENSLEY STREET, RICHMOND, CA 94801</b> <b>(201) 347-1909</b>				L. State Manifest Document Number <b>NJA1039510</b>					
24. Transporter 1 Company Name <b>SUTLES TRUCK LEASING INC</b>				M. State Generator's ID <b>SAME NJDEP</b>					
25. US EPA ID Number <b>ALD095704011</b>				N. State Trans. ID <b>437 60065</b>					
26. Transporter 2 Company Name				O. Trans. Phone <b>(205) 289-0670</b>					
27. US EPA ID Number				P. State Trans. ID					
				Q. Trans. Phone					
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.		
				No.	Type				
a.	HM	WASTE POISON B SOLID, NOS (VANADIUM PENTOXIDE, BARIUM CHLORIDE)		POISON B UN2811	0001	DF	000115	P	D005
b.	X	WASTE ORM-B, NOS		ORM-B NA1760	0001	DF	000115	P	D005
c.	X	WASTE ORM-B, NOS		ORM-B NA1760	0001	DF	000115	P	D008
d.	X	WASTE ORM-B, NOS		ORM-B NA1760	0002	DF	000230	P	X050
e.	X	RD WASTE ORM-A, NOS (CARBON TETRACHLORIDE)		ORM-A NA1693	0001	DF	000115	P	U211
f.	X	WASTE ORM-A, NOS		ORM-A NA1693	0001	DF	000115	P	D007
g.	X	WASTE ORM-A, NOS		ORM-A NA1693	0002	DF	000230	P	U122
h.	X	WASTE ORM-A, NOS		ORM-A NA1693	0001	DF	000115	P	U147
i.	X	WASTE ORM-A, NOS		ORM-A NA1693	0002	DF	000230	P	U165
S. Additional Descriptions for Materials Listed Above <b>A-C) S/E PLC</b> <b>D) B/- PLC</b> <b>E,B,H,I) S/T PLC</b> <b>F) S/E PLC</b>				T. Handling Codes for Wastes Listed Above					
32. Special Handling Instructions and Additional Information <b>PACKING SLIPS ATTACHED FOR CLARIFICATION (TRANSIT ONLY)</b>									
33. Transporter 1 Acknowledgement of Receipt of Materials				Date					
Printed/Typed Name <b>G. Boyd Jackson</b>				Signature <i>G. Boyd Jackson</i>		Month Day Year <b>01/13/91</b>			
34. Transporter 2 Acknowledgement of Receipt of Materials				Date					
Printed/Typed Name				Signature		Month Day Year			
35. Discrepancy Indication Space									

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)		21. Generator's US EPA ID No. <b>CA1000014079</b>	Manifest Document No. <b>A1039510</b>		22. Page <b>5 of 5</b>	Information in the shaded areas is not required by Federal law.	
23. Generator's Name <b>ALIFORNIA AETC</b> <b>1125 HENSLEY STREET, RICHMOND, CA 94801</b> <b>(201) 347-1909</b>					L. State Manifest Document Number <b>NJA1039510</b>		
24. Transporter 1 Company Name <b>SUTILES TRUCK LEASING INC</b>					M. State Generator's ID <b>SAME NJ DEFS</b>		
25. US EPA ID Number <b>ALD095704011</b>					N. State Trans. ID <b>907 60065</b>		
26. Transporter 2 Company Name					O. Trans. Phone <b>(205) 289-0670</b>		
27. US EPA ID Number					P. State Trans. ID		
					Q. Trans. Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					29. Containers	30. Total Quantity	31. Unit Wt/Vol
					No.	Type	R. Waste No.
a.	HM	<b>WASTE ORM-A, NOS</b>			<b>0001</b>	<b>DF</b>	<b>000115</b>
	X	<b>ORM-A</b>					<b>P</b>
		<b>NA1693</b>					<b>X850</b>
b.							
c.							
d.							
e.							
f.							
g.							
h.							
i.							
S. Additional Descriptions for Materials Listed Above <b>A) S/- PLC</b>					T. Handling Codes for Wastes Listed Above		
32. Special Handling Instructions and Additional Information <b>RECEIVING SLIPS ATTACHED FOR CLARIFICATION (TRANSIT ONLY)</b>							
33. Transporter 1 Acknowledgement of Receipt of Materials					Date		
Printed/Typed Name <b>G. Boyd Jackson</b>					Signature <b>G. Boyd Jackson</b>		Month Day Year <b>01/23/91</b>
34. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name					Signature		Month Day Year
35. Discrepancy Indication Space							

GENERATOR

TRANSPORTER

FACILITY



State of New Jersey  
Department of Environmental Protection  
Division of Hazardous Waste Management  
Manifest Section

CN 028, Trenton, NJ 08625

Form Approved. OMB No. 2050-0039. Expires 9-30-91

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. 5 ATTACHED Manifest Document No. 1039510 of 5

Information in the shaded areas is not required by Federal law.

## 3. Generator's Name and Mailing Address

CALIFORNIA ACETIC  
1125 HENLEY STREET, RICHMOND, CA 94801

## 4. Generator's Phone ( 415 ) 233-8001

## 5. Transporter 1 Company Name

EUTILES TRUCK LEASING INC

## 6. US EPA ID Number

410095704011

## 7. Transporter 2 Company Name

## 8. US EPA ID Number

## 9. Designated Facility Name and Site Address

ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION  
EDEN LANE  
FLANDERS NJ 07836

## 10. US EPA ID Number

410095704011

## A. State Manifest Document Number

NJ 1039510

## B. State Generator's ID

SAFE

## C. State Trans ID

9071112560065

## D. Transporter's Phone

205 1289-0670

## E. State Trans. ID

## F. Transporter's Phone ( )

## G. State Facility's ID

N/A

## H. Facility's Phone (201 )

347-1907

## 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

## a. WASTE POISON B LIQUID, NOS

X

(ANILINE, PHENOL)

POISON B  
UN2810

## 12. Containers

No.

Type

## 13. Total Quantity

## 14. Unit Wt/Vol

## 1. Waste No.

0001

DF

000115

P

U180

## b. WASTE POISON B LIQUID, NOS

X

(SODIUM ACETATE, PHENOL)

POISON B  
UN2810

0001

DF

000115

P

D005

## c. WASTE POISON B LIQUID, NOS

X

(MERCAPTOETHANOL, METHYL IODIDE)

POISON B  
UN2810

0001

DF

000115

P

D011

## d. WASTE POISON B LIQUID, NOS

X

(METHYL IODIDE, DIAMINO BENZIDINE)

POISON B  
UN2810

0001

DF

000115

P

U138

## J. Additional Descriptions for Materials Listed Above

E/T PLC

S/E PLC

## K. Handling Codes for Wastes Listed Above

a. S/E PLC

c. S/T PLC

a. SP 1

c. S 0 1

b. S/E PLC

d. S/T PLC

b. S 0 1

d. S 0 1

## 15. Special Handling Instructions and Additional Information

24 HR EMERGENCY NUMBER: 1-800-421-9300

PACKING SLIPS ATTACHED FOR CLARIFICATION (TRANSIT ONLY)

## 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

DAN ELLEREDGE

Signature

Month Day Year

12/12/91

## 17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

G. Boyd Jackson

Signature

Month Day Year

10/12/91

## 18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

12/12/91

## 19. Discrepancy Indication Space

## 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Tiff Smith

Signature

Month Day Year

12/12/91

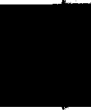
<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> <i>(Continuation Sheet)</i>		21. Generator's US EPA ID No.		Manifest Document No.		22. Page		Information in the shaded areas is not required by Federal law.					
		CAT080014079		A1039510		5 of 5							
23. Generator's Name CALIFORNIA AETC 1125 HENSLEY STREET, RICHMOND, CA 94801 (201) 347-1909						L. State Manifest Document Number NJA1039510							
						M. State Generator's ID SAME							
24. Transporter 1 Company Name SUTTLES TRUCK LEASING INC						25. US EPA ID Number ALD095704011							
26. Transporter 2 Company Name						27. US EPA ID Number							
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						29. Containers		30. Total Quantity		31. Unit		R. Waste No.	
						No. Type		Wt/Vol					
a. <input checked="" type="checkbox"/> WASTE ORM-A, NOS						0001 DF		000115		P		X850	
b.													
c.													
d.													
e.													
f.													
g.													
h.													
i.													
S. Additional Descriptions for Materials Listed Above A) S/- PLC						T. Handling Codes for Wastes Listed Above A-501 HCR G.M. (1/20/91)							
32. Special Handling Instructions and Additional Information PACKING SLIPS ATTACHED FOR CLARIFICATION (TRANSIT ONLY)													
33. Transporter 1 Acknowledgement of Receipt of Materials										Date			
Printed/Typed Name G. Boyd Jackson					Signature G. Boyd Jackson					Month Day Year 01/23/91			
34. Transporter 2 Acknowledgement of Receipt of Materials										Date			
Printed/Typed Name					Signature					Month Day Year			
35. Discrepancy Indication Space													

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. <b>CAT080014079</b>	Manifest Document No. <b>A1039510</b>	22. Page <b>4 of 5</b>	Information in the shaded areas is not required by Federal law.		
23. Generator's Name <b>CALIFORNIA AETC 1125 HENSLEY STREET, RICHMOND, CA 94801 (201) 347-1909</b>				L. State Manifest Document Number <b>NJA1039510</b>			
24. Transporter 1 Company Name <b>SUTTLES TRUCK LEASING INC</b>		25. US EPA ID Number <b>ALD095704011</b>		N. State Transp. ID <b>987 60065</b>			
26. Transporter 2 Company Name		27. US EPA ID Number		O. Trans. Phone <b>(205) 289-0670</b>			
				P. State Trans. ID			
				Q. Trans. Phone			
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
				No.	Type		
a.	<input checked="" type="checkbox"/> HM	WASTE POISON B SOLID, NOS (VANADIUM PENTOXIDE, BARIUM CHLORIDE)	POISON B UN2811	0001	DF	000115	P D005
b.	<input checked="" type="checkbox"/>	WASTE ORM-B, NOS	ORM-B NA1760	0001	DF	000115	P D005
c.	<input checked="" type="checkbox"/>	WASTE ORM-B, NOS	ORM-B NA1760	0001	DF	000115	P D008
d.	<input checked="" type="checkbox"/>	WASTE ORM-B, NOS	ORM-B NA1760	0002	DF	000230	P X850
e.	<input checked="" type="checkbox"/>	RQ WASTE ORM-A, NOS (CARBON TETRACHLORIDE)	ORM-A NA1693	0001	DF	000115	P U211
f.	<input checked="" type="checkbox"/>	WASTE ORM-A, NOS	ORM-A NA1693	0001	DF	000115	P D007
g.	<input checked="" type="checkbox"/>	WASTE ORM-A, NOS	ORM-A NA1693	0002	DF	000230	P U122
h.	<input checked="" type="checkbox"/>	WASTE ORM-A, NOS	ORM-A NA1693	0001	DF	000115	P U147
i.	<input checked="" type="checkbox"/>	WASTE ORM-A, NOS	ORM-A NA1693	0002	DF	000230	P U165
S. Additional Descriptions for Materials Listed Above A-C) S/E PLC D) S/- PLC E,G,H,I) S/T PLC F) S/E PLC				T. Handling Codes for Wastes Listed Above <b>AE SOL</b> <b>RECE</b> <b>1/30/91</b>			
32. Special Handling Instructions and Additional Information <b>PACKING SLIPS ATTACHED FOR CLARIFICATION (TRANSIT ONLY)</b>							
TRANSPORTER	33. Transporter 1 Acknowledgement of Receipt of Materials			Date			
	Printed/Typed Name <b>G. Boyd Jackson</b>		Signature <b>G. Boyd Jackson</b>	Month Day Year <b>01/12/91</b>			
FACILITY	34. Transporter 2 Acknowledgement of Receipt of Materials			Date			
	Printed/Typed Name		Signature	Month Day Year			
35. Discrepancy Indication Space							

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. <b>CAT080014079</b>	Manifest Document No. <b>A1039510</b>		22. Page <b>3 of 5</b>	Information in the shaded areas is not required by Federal law.	
23. Generator's Name <b>ALIFORNIA AETC 1125 HENSLEY STREET, RICHMOND, CA 94801 (201) 347-1909</b>					L. State Manifest Document Number <b>NJA1039510</b>		
24. Transporter 1 Company Name <b>SUTTLES TRUCK LEASING INC</b>					M. State Generator's ID <b>SAME</b>		
25. US EPA ID Number <b>ALD095704011</b>					N. State Trans. ID <b>ATDEPS 60065</b>		
26. Transporter 2 Company Name					O. Trans. Phone <b>(205) 289-0670</b>		
27. US EPA ID Number					P. State Trans. ID		
					Q. Trans. Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					29. Containers	30. Total Quantity	31. Unit Wt/Vol
					No.	Type	R. Waste No.
a.	X	WASTE POISON B SOLID, NOS (AMMONIUM VANADATE, BARIUM CHLORIDE)	POISON B UN2811	0001	DF	000115	P D005
b.	X	WASTE POISON B SOLID, NOS (BARIUM CHLORIDE)	POISON B UN2811	0001	DF	000115	P D005
c.	X	WASTE POISON B SOLID, NOS (BARIUM CHLORIDE, BARIUM SULFIDE)	POISON B UN2811	0001	DF	000115	P D005
d.	X	WASTE POISON B SOLID, NOS (BARIUM CHLORIDE, CADMIUM CHLORIDE)	POISON B UN2811	0001	DF	000115	P D005
e.	X	WASTE POISON B SOLID, NOS (BARIUM CHLORIDE, CADMIUM SULFATE)	POISON B UN2811	0001	DF	000115	P D005
f.	X	WASTE POISON B SOLID, NOS (LACODYLIC ACID, THIOREA)	POISON B UN2811	0001	DF	000115	P D004
g.	X	WASTE POISON B SOLID, NOS (PHENOL, THIOREA)	POISON B UN2811	0002	DF	000230	P U188
h.	X	WASTE POISON B SOLID, NOS (SODIUM ARSENATE)	POISON B UN2811	0001	DF	000115	P D004
i.	X	WASTE POISON B SOLID, NOS (THIOREA, THIOPHENOL)	POISON B UN2811	0001	DF	000115	P U219
S. Additional Descriptions for Materials Listed Above <b>A-D) S/E PLC E,F,H) S/E PLC G,I) S/T PLC</b>					T. Handling Codes for Wastes Listed Above <b>25 SOL RSC 1/30/91</b>		
32. Special Handling Instructions and Additional Information <b>PACKING SLIPS ATTACHED FOR CLARIFICATION (TRANSIT ONLY)</b>							
33. Transporter 1 Acknowledgement of Receipt of Materials					Date		
Printed/Typed Name <b>G. Boyd Jackson</b>				Signature <b>G. Boyd Jackson</b>		Month Day Year <b>01/23/91</b>	
34. Transporter 2 Acknowledgement of Receipt of Materials					Date		
Printed/Typed Name				Signature		Month Day Year	
35. Discrepancy Indication Space							

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. <b>CAT080014079</b>	Manifest Document No. <b>A1039510</b>		22. Page <b>2 of 5</b>	Information in the shaded areas is not required by Federal law.				
23. Generator's Name <b>ALIFORNIA AETC</b> <b>1125 HENSLEY STREET, RICHMOND, CA 94801</b> <b>(201) 347-1909</b>					L. State Manifest Document Number <b>NJA1039510</b>					
24. Transporter 1 Company Name <b>SUTTLES TRUCK LEASING INC</b>					M. State Generator's ID <b>SAME</b>					
25. US EPA ID Number <b>ALD095704011</b>					N. State Trans. ID <b>1987 NJDEP 60065</b>					
26. Transporter 2 Company Name					O. Trans. Phone <b>(205) 289-0670</b>					
27. US EPA ID Number					P. State Trans. ID					
					Q. Trans. Phone					
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					29. Containers	30. Total Quantity	31. Unit Wt/Vol			
					No.	Type	R. Waste No.			
a.	HM	WASTE POISON B LIQUID, NOS (METHYL IODIDE, MERCAPTOETHANOL)			POISON B UN2810	0001	DF	000115	P	D011
b.	X	WASTE POISON B LIQUID, NOS (METHYL IODIDE, PHENYL ARSONIC ACID)			POISON B UN2810	0001	DF	000115	P	D004
c.	X	WASTE POISON B LIQUID, NOS (PHENOL, ANILINE)			POISON B UN2810	0001	DF	000115	P	U188
d.	X	WASTE POISON B LIQUID, NOS (PHENOL, DIBROMOETHANOL)			POISON B UN2810	0001	DF	000115	P	U188
e.	X	WASTE POISON B LIQUID, NOS (PHENOL, MERCAPTOETHANOL)			POISON B UN2810	0001	DF	000115	P	U188
f.	X	WASTE POISON B LIQUID, NOS (PHENOL, 1,4-NAPHTHOQUINONE)			POISON B UN2810	0001	DF	000115	P	U188
g.	X	WASTE POISON B LIQUID, NOS (THIOREA, PHENOL)			POISON B UN2810	0001	DF	000115	P	D022
h.	X	WASTE POISON B LIQUID, NOS (VANADIUM, BARIUM CHLORIDE)			POISON B UN2810	0001	DF	000115	P	D005
i.	X	WASTE POISON B LIQUID, NOS (1,2-DIBROMOETHANE, PHENOL)			POISON B UN2810	0001	DF	000115	P	U197
S. Additional Descriptions for Materials Listed Above A,B) S/E PLC C,D) S/T PLC E,F,I) S/T PLC G,H) S/E PLC					T. Handling Codes for Wastes Listed Above A-I SVI ACK 1/30/91					
32. Special Handling Instructions and Additional Information PACKING SLIPS ATTACHED FOR CLARIFICATION (TRANSIT ONLY)										
33. Transporter 1 Acknowledgement of Receipt of Materials					Date					
Printed/Typed Name <b>G. Boyd Jackson</b>					Signature <b>G. Boyd Jackson</b>					
34. Transporter 2 Acknowledgement of Receipt of Materials					Month Day Year <b>01/23/91</b>					
Printed/Typed Name					Signature					
35. Discrepancy Indication Space					Month Day Year					



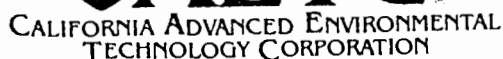


UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address		CHERN INC. ATTN: ANN MARIE 4560 HORTON STREET EMERYVILLE, CA. 94608		A. State Manifest Document Number 90621233	
4. Generator's Phone (415) 655-8734		5. Transporter 1 Company Name CALIFORNIA AETC		B. State Generator's ID H 61A0316-01111310	
6. US EPA ID Number ICAD 91824971158		7. Transporter 2 Company Name		C. State Transporter's ID 107411-4842474	
8. US EPA ID Number		9. Designated Facility Name and Site Address CALIFORNIA AETC 1125 HENSLEY ST. RICHMOND, CA. 94801		D. Transporter's Phone 415-722-7000	
10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		E. State Transporter's ID 418118-3441781	
12. Containers		13. Total Quantity		F. Transporter's Phone 415-722-722-7000	
14. Unit		15. Special Handling Instructions and Additional Information		G. State Facility's ID	
16. Waste No.		17. Transporter 1 Acknowledgement of Receipt of Materials		H. Facility's Phone	
State 551		Printed/Typed Name		ICAD 080014079	
EPA/Other F003		Signature		415-233-8001	
State 551		Month Day Year			
EPA/Other D001		10/21/1991			
State 551		17. Transporter 2 Acknowledgement of Receipt of Materials			
EPA/Other D001		Printed/Typed Name			
State 551		Signature			
EPA/Other F003		Month Day Year			
		10/21/1991			
		18. Discrepancy Indication Space			
		Printed/Typed Name			
		Signature			
		Month Day Year			
		10/21/1991			
		19. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.			
		Printed/Typed Name			
		Signature			
		Month Day Year			
		10/21/1991			

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL  
 ENVIRONMENTAL PROTECTION AGENCY CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7555

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL  
 ENVIRONMENTAL PROTECTION AGENCY CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7555

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)		21. Generator's US EPA ID No. <b>CAD046866463</b>	Manifest Document No. <b>CA01065</b>	22. Page <b>2 of 2</b>	Information in the shaded areas is not required by Federal law.																																																		
23. Generator's Name <b>CHIRON INC. ATTN: ANN MARIE Bakker</b> <b>4560 HORTON STREET</b> <b>EMERYVILLE CA. 94608</b>				L. State Manifest Document Number <b>90621233</b> M. State Generator's ID <b>HGHQ36-011130</b>																																																			
24. Transporter 1 Company Name <b>Cal. BERNIA AETC</b>		25. US EPA ID Number <b>CAD 982497158</b>		N. State Trans. ID <b>107411-4042474</b>																																																			
26. Transporter 2 Company Name		27. US EPA ID Number		O. Trans. Phone <b>415-782-7000</b> P. State Trans. ID <b>718118-3601781</b> Q. Trans. Phone <b>415-782-7000</b>																																																			
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Type</th> <th>30. Total Quantity</th> <th>31. Unit Wt/Vol</th> <th>R. Waste No.</th> </tr> </thead> <tbody> <tr> <td>a. <input checked="" type="checkbox"/> <b>WASTE FLAMMABLE LIQUID, POISONOUS, N.O.S. (PHENOL, ETHIDIUM BROMIDE) FLAMMABLE LIQUID UN 1992</b></td> <td>1</td> <td>DF</td> <td>115</td> <td>P 551 F003</td> </tr> <tr> <td>b. <input checked="" type="checkbox"/> <b>WASTE CORROSIVE LIQUID, N.O.S. CORROSIVE MATERIAL UN 1760</b></td> <td>7</td> <td>DF</td> <td>530</td> <td>P 551 D002</td> </tr> <tr> <td>c. <input checked="" type="checkbox"/> <b>WASTE ALKALINE (CORROSIVE) LIQUID, N.O.S. CORROSIVE MATERIAL NA 1719</b></td> <td>5</td> <td>DF</td> <td>410</td> <td>P 551 D002</td> </tr> <tr> <td>d. <input checked="" type="checkbox"/> <b>WASTE POISON B, LIQUID, N.O.S. (ETHIDIUM BROMIDE) POISON B UN 2810</b></td> <td>2</td> <td>DF</td> <td>120</td> <td>P 551 none</td> </tr> <tr> <td>e. <input checked="" type="checkbox"/> <b>WASTE POISON B, LIQUID, N.O.S. (PHENOL, ETHIDIUM BROMIDE) POISON B UN 2810</b></td> <td>2</td> <td>DF</td> <td>230</td> <td>P 551 D022</td> </tr> <tr> <td>f. <input checked="" type="checkbox"/> <b>WASTE POISON B, SOLID, N.O.S. (PHENOL) POISON B UN 2811</b></td> <td>1</td> <td>DF</td> <td>250</td> <td>P 352 D022</td> </tr> <tr> <td>g. <input checked="" type="checkbox"/> <b>WASTE ORM-A, N.O.S. ORM-A NA 1693</b></td> <td>1</td> <td>DF</td> <td>115</td> <td>P 551 0007</td> </tr> <tr> <td>h. <input checked="" type="checkbox"/> <b>WASTE ORM-A, N.O.S. ORM-A NA 1693</b></td> <td>1</td> <td>DF</td> <td>60</td> <td>P 551 U122</td> </tr> <tr> <td>i. <input type="checkbox"/></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.	a. <input checked="" type="checkbox"/> <b>WASTE FLAMMABLE LIQUID, POISONOUS, N.O.S. (PHENOL, ETHIDIUM BROMIDE) FLAMMABLE LIQUID UN 1992</b>	1	DF	115	P 551 F003	b. <input checked="" type="checkbox"/> <b>WASTE CORROSIVE LIQUID, N.O.S. CORROSIVE MATERIAL UN 1760</b>	7	DF	530	P 551 D002	c. <input checked="" type="checkbox"/> <b>WASTE ALKALINE (CORROSIVE) LIQUID, N.O.S. CORROSIVE MATERIAL NA 1719</b>	5	DF	410	P 551 D002	d. <input checked="" type="checkbox"/> <b>WASTE POISON B, LIQUID, N.O.S. (ETHIDIUM BROMIDE) POISON B UN 2810</b>	2	DF	120	P 551 none	e. <input checked="" type="checkbox"/> <b>WASTE POISON B, LIQUID, N.O.S. (PHENOL, ETHIDIUM BROMIDE) POISON B UN 2810</b>	2	DF	230	P 551 D022	f. <input checked="" type="checkbox"/> <b>WASTE POISON B, SOLID, N.O.S. (PHENOL) POISON B UN 2811</b>	1	DF	250	P 352 D022	g. <input checked="" type="checkbox"/> <b>WASTE ORM-A, N.O.S. ORM-A NA 1693</b>	1	DF	115	P 551 0007	h. <input checked="" type="checkbox"/> <b>WASTE ORM-A, N.O.S. ORM-A NA 1693</b>	1	DF	60	P 551 U122	i. <input type="checkbox"/>				
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S. Additional Descriptions for Materials Listed Above <b>A. B. C. D. E. F. H. PACK LAB CHEMICALS; 5/1, 5/2, 5/3, 5/4, 5/5, 5/6, 5/7, 5/8</b> <b>* F. Phenol And chloroform 45%, Debris 95%; 5/1</b>				T. Handling Codes for Wastes Listed Above <b>A → H - 14/07</b>																																																			
32. Special Handling Instructions and Additional Information <b>* F. D.O.T. E-7768-30 200L CONTAINER</b> <b>Emergency response # 1-800-424-9300</b>																																																							
<b>Packing slips ATTACHED FOR clarification of materials</b>																																																							
33. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: <b>C ALLEN KROLL</b> Signature: <b>C Allen Kroll</b>				Date Month Day Year <b>02/14/91</b>																																																			
34. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: <b>C ALLEN KROLL</b> Signature: <b>C Allen Kroll</b>				Date Month Day Year <b>02/14/91</b>																																																			
35. Discrepancy Indication Space																																																							

Worksheet # CA01065

P.O. # \_\_\_\_\_

Date 2/14/91

## Shipping/Receiving

1987©

Company: CHIRON INC.

Address: 4560 HORTON ST.

City/State: Emeryville CA 94608

Destination: California AETC

Transporter: Cal. Furnish AETC

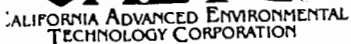
Placard: Dangerous

<u>1</u>	TOTAL DRUMS	<u>2495</u>	TOTAL NET WEIGHT	MANIFEST NUMBER <u>906 21233</u>	PAGE(S) <u>2</u>
<u>26</u>	TOTAL PIECES	SUBJECT TO CHANGE BY SCALE		MATERIALS / EQUIPMENT	

MANPOWER				VERMICULITE	10936	3	SAWDUST	10940/10941	2	RO-CON 21C-60	(C)	10954	1
NAME	TIME IN	TIME OUT	LUNCH	17H DRUMS	10900		17E DRUMS	10903		RO-CON 21C-115		10953	3
Allen	8:30	12:00	N	6D DRUMS	10905		6D PAILS	10909		21C-60(S)			1
Shannon	↓	↓	↓	85 GAL METAL RECOVERY	10911		10 GAL METAL RECOVERY	10915					
				ENVIROPAX PLASTIC RECOVERY	10913		15A WOOD	10926					
				12A50 FIBER	10923		12B15 FIBER	10925					
				12A60 FIBER	10922		12A80 FIBER	10921					
				30 GAL. 21C FIBER	10919		30 GAL. N/M 21C FIBER	11054					
				EQUIPMENT LEVEL A B C									
				EMERGENCY RESPONSE		CASE NUMBER							
TRAVEL TIME ROUND TRIP	zhr	MILEAGE ROUND TRIP			OVERNIGHT JOB			NUMBER OF NIGHTS			NUMBER OF VEHICLES		1

COMMENTS: Service + Ship

I, the undersigned having full authority to execute this document on behalf of said company (Generator) confirm that California Advanced Environmental Technology Corporation (California A.E.T.C.) has been contracted to perform waste packaging and/or waste removal services and has satisfactorily documented and completed these services for which they were hired. Therefore as the authorized representative of the contracting company (Generator) I guarantee full and prompt payment to California A.E.T.C. for services rendered.



2/14/91  
DATE ACCUMULATED

2/14/91  
DATE SHIPPED

CA01065 #24  
CONTAINER #

CHIRON INC.  
4560 HORTON ST.  
EMERYVILLE CA. 94608

GENERATOR - ADDRESS - EPA # CAD 046866463

90621233	ZF
MANIFEST	PG/LINE

WASTE poison B, solid, n.o.s. (phenol)

poison B

2811

DOT PROPER SHIPPING NAME — HAZARD CLASS

5T-2656

128081

UN/NA

DISPOSAL CODE

W.I.P. #

GROUP

5/6/33

2. 11. 2015 17:30

COMMON DRUGS	EPA CODE
1	E1

305AL P.O.  
CONTAINER TYPE

DF

TOTAL NET  
WEIGHT

250 \$

        
TECHNICAL SUPERVISOR

INITIALS



HAYWARD COMMERCE CENTER  
19410 CABOT BOULEVARD  
HAYWARD, CA 94545 415-782-7000

CALIFORNIA ADVANCED ENVIRONMENTAL  
TECHNOLOGY CORPORATION  
WASTE INFORMATION PROFILE © 1986 AETC

CALIFORNIA AETC USE ONLY

DISP CODE ST-2656

WASTE NAME PHENOL AND CHLOROFORM DEBRIS GENERATOR EPA ID. CAD046866463  
GENERATOR NAME CHIRON INC. WASTE I.D. D022 C176 C377  
ADDRESS 4560 Hutton Street Emeryville CA 94608 352

UNITS      PROD      CS      PC      COD      FOR CALIFORNIA AETC USE ONLY  
APP     

SHIPPING NAME WASTE POISON B, SOLID, n.s. (phenol)  
HAZARD CLASS Poison B UN/NA 2811 RQ -  
PROCESS GENERATING WASTE Lab

<b>HALOGENS</b> <input type="checkbox"/> <2% <input type="checkbox"/> 2-5% <input type="checkbox"/> 5-10% <input type="checkbox"/> 10-30% <input type="checkbox"/> >30% <input type="checkbox"/> EXACT	<input type="checkbox"/> Cl <input type="checkbox"/> F <input type="checkbox"/> Br <input type="checkbox"/> I <input type="checkbox"/> EXACT	<b>LAYERS</b> <input checked="" type="checkbox"/> MULTILAYERED <input type="checkbox"/> BI-LAYERED <input type="checkbox"/> SINGLE PHASE <b>COLOR:</b>	<b>SOLIDS</b> <input type="checkbox"/> SUSPENDED % <input checked="" type="checkbox"/> SETTLEABLE <u>100</u> % <input type="checkbox"/> DISSOLVED %	<b>ODOR</b> <input type="checkbox"/> NONE <input checked="" type="checkbox"/> MILD <input type="checkbox"/> STRONG DESCRIBE: <u>phenol</u>	<b>PHYSICAL STATE</b> <input checked="" type="checkbox"/> SOLID <input type="checkbox"/> SEMI SOLID <input type="checkbox"/> LIQUID <input type="checkbox"/> GAS <input type="checkbox"/> FLOWABLE <input type="checkbox"/> POWDER <input type="checkbox"/> PUMPABLE <input type="checkbox"/> SEMISOLID
<b>PH</b> <input type="checkbox"/> <2 <input type="checkbox"/> 2-5 <input checked="" type="checkbox"/> 5-9 <input type="checkbox"/> 9-12.5 <input type="checkbox"/> >12.5 <input type="checkbox"/> EXACT	<b>SPECIFIC GRAV.</b> <input type="checkbox"/> <.8 <input type="checkbox"/> .8-1.0 <input type="checkbox"/> 1.0 <input checked="" type="checkbox"/> 1.0-1.2 <input type="checkbox"/> >1.2 <input type="checkbox"/> EXACT	<b>FLASH POINT (°F)</b> <input type="checkbox"/> <80 <input type="checkbox"/> 80-100 <input type="checkbox"/> 101-140 <input type="checkbox"/> 141-200 <input checked="" type="checkbox"/> >200 <input type="checkbox"/> NO FLASH <input type="checkbox"/> EXACT	<b>BTU/LB.</b> <u>10-15,000</u> <b>% ASH</b> <u>&lt;2</u> <b>WATER SOLUBILITY</b> <u>&lt;2</u>	<b>VISCOSITY</b> <input type="checkbox"/> HIGH (SYRUP) <input type="checkbox"/> MEDIUM (OIL) <input checked="" type="checkbox"/> LOW (WATER) <u>20/A</u>	<b>HAZARDOUS CHARACTERISTICS</b> <input type="checkbox"/> REACTIVE <input type="checkbox"/> RADIOACTIVE <input type="checkbox"/> EXPLOSIVE SPECIFY <u>none</u>

**CHEMICAL COMPOSITION**  
Name: Phenol and Chloroform Debris  
Debris (glass, IAGG, Tangle, plastic, tubing, etc.)  
Phenol and Chloroform Mixture  
ACCOUNT FOR 100%  
95 %  
5 %  
%  
%  
%  
%  
%  
%

**TOXICITY CHARACTERISTICS**  
(AND OTHER METALS AND ORGANICS)  
TOTAL (%) ☐ TOTAL (PPM) ☒ TCLP (mg/L) ☒  
CONTAMINANT CONC.  
n/a  
0.0  
V  
V

FOR CALIFORNIA AETC USE ONLY

PRESENT CONTAINER (TYPE/SIZE): ☐ 17H ☐ 17E ☐ 6D ☒ FIBER DR. ☐ BOX ☐ OTHER DATE 20E SIZE 30 GAL  
SHIPPING CONTAINER (TYPE/SIZE): ☐ 17H ☐ 17E ☐ 6D ☐ FIBER DR. ☐ BOX ☐ OTHER      SIZE 1  
ANTICIPATED VOLUME: 2-3 ☐ GALS. ☐ DRUMS PER ☐ ONE TIME  
☐ CU. YDS. ☐ OTHER      ☐ MONTH ☐ YEAR

ADDITIONAL INFORMATION:       
      
    

**CERTIFICATION**  
I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete to the best of my knowledge and ability and that all known and suspected hazards have been disclosed.  
SIGNATURE [Signature] DATE      PHONE 415-655-8234 1129  
128081

PAGE/ LINE      D E S C R I P T I O N      ID #      CONTAINER # TYPE      QTY      U      V      CHEM FORM      CMPL      DATE      W.O. #  
1D DOT NM1> WASTE FLAMMABLE LIQUID, CORROSIVE, NOS      UN2924      2      DF      230      F      17      N      S      Y  
DOT NM2>  
ADDL -> PLC  
HAZ CL-> FLAMMABLE LIQUID  
WASTE -> I/T F003/551  
HANDLE-> 14 07 INCINERATION  
REJECT-> FROM->  
OUTGOING-> 1. MANIFEST LN CNT DEST DATE W.O. #  
2. 1C 2 AETND 2/20/91  
3.  
4.  
5.

PAGE/ LINE      D E S C R I P T I O N      ID #      CONTAINER # TYPE      QTY      U      V      CHEM FORM      CMPL      DATE      W.O. #  
2A DOT NM1> WASTE FLAMMABLE LIQUID, POISONOUS, NOS      UN1992      1      DF      115      F      17      N      S      Y  
DOT NM2> (PHENOL, ETHIDIUM BROMIDE)  
ADDL -> PLC  
HAZ CL-> FLAMMABLE LIQUID  
WASTE -> I F003/551  
HANDLE-> 14 07 INCINERATION  
REJECT-> FROM->  
OUTGOING-> 1. MANIFEST LN CNT DEST DATE W.O. #  
2. 3C 1 AETND 2/20/91  
3.  
4.  
5.

PAGE/ LINE      D E S C R I P T I O N      ID #      CONTAINER # TYPE      QTY      U      V      CHEM FORM      CMPL      DATE      W.O. #  
2B DOT NM1> WASTE CORROSIVE LIQUID, NOS      UN1760      7      DF      530      F      17      N      S  
DOT NM2>  
ADDL -> PLC  
HAZ CL-> CORROSIVE MATERIAL  
WASTE -> C D002/551  
HANDLE-> 14 07 INCINERATION  
REJECT-> FROM->  
OUTGOING-> 1. MANIFEST LN CNT DEST DATE W.O. #  
2. 1A 1039514 1R 5 AETND 2/20/91  
3.  
4.  
5.

PAGE/ LINE      D E S C R I P T I O N      ID #      CONTAINER # TYPE      QTY      U      V      CHEM FORM      CMPL      DATE      W.O. #  
2C DOT NM1> WASTE ALKALINE (CORROSIVE) LIQUID, NOS      NA1719      5      DF      410      F      17      N      S  
DOT NM2>  
ADDL -> PLC  
HAZ CL-> CORROSIVE MATERIAL  
WASTE -> C D002/551  
HANDLE-> 14 07 INCINERATION  
REJECT-> FROM->

AERF10

MANIFEST DAILY REPORT FROM 2/28/91 TO 2/28/91

RUN 2/28/91 16.10.44

PAGE 4

PAGE/  
LINE DESCRIPTION

ID # CONTAINER  
# TYPE QTY U CHEM FORM CMFL

2H DOT NM1> WASTE ORN-A, NOS

NA1693 1 DF 60 F 17 N S Y

DOT NM2>

ADDL -> PLC

HAZ CL-> ORN-A

WASTE -> T U122/551

HANDLE-> 14 07 INCINERATION

REJECT-> FROM->

OUTGOING-> 1. MANIFEST LN CNT DEST DATE W.O. #  
NA1039513 36 1 AETND 2/20/91

2.  
3.  
4.  
5.

PAGE/ LINE	DESCRIPTION	ID #	CONTAINER # TYPE	QTY	U V	CHEM	FORM	CMPL
2D	DOT NM1> WASTE POISON B LIQUID, NOS DOT NM2> DOT --> (ETHIDIUM BROMIDE) ADDL --> PLC HAZ CL-> POISON B WASTE -> N/A NONE/551 HANDLE-> 14 07 INCINERATION REJECT-> FROM->	UN2810	2 DF	120	P	17 N	S	

PAGE/ LINE	DESCRIPTION	ID #	CONTAINER # TYPE	QTY	U V	CHEM	FORM	CMPL
2E	DOT NM1> WASTE POISON B LIQUID, NOS DOT NM2> DOT --> (PHENOL, ETHIDIUM BROMIDE) ADDL --> PLC HAZ CL-> POISON B WASTE -> E D022/551 HANDLE-> 14 07 INCINERATION REJECT-> FROM->	UN2810	2 DF	230	P	17 N	S	

PAGE/ LINE	DESCRIPTION	ID #	CONTAINER # TYPE	QTY	U V	CHEM	FORM	CMPL
2F	DOT NM1> WASTE POISON B SOLID, NOS DOT NM2> DOT --> (PHENOL) ADDL --> HAZ CL-> POISON B WASTE -> E D022/352 HANDLE-> 14 07 INCINERATION REJECT-> FROM->	UN2811	1 DF	250	P	17 N	S	

PAGE/ LINE	DESCRIPTION	ID #	CONTAINER # TYPE	QTY	U V	CHEM	FORM	CMPL
2G	DOT NM1> WASTE ORM-A, NOS DOT NM2> DOT --> ADDL --> PLC HAZ CL-> ORM-A WASTE -> T U007/551 HANDLE-> 14 07 INCINERATION REJECT-> FROM->	NA1693	1 DF	115	P	17 N	S	Y

MANIFEST	LN	CNT	DEST	DATE	W.O. #	
OUTGOING->	1.	NJA1039513	3E	1	AETNJ	2/20/91
	2.					
	3.					
	4.					
	5.					



MANIFEST # -&gt; 90621233

DATE SHIPPED -&gt; 2/14/91

DATE RECEIVED -&gt; 2/15/91

COMPLETE-&gt;

WRK ORDER # -&gt;

BRANCH/GEN MAN-&gt; CA/01065

INITIALS-&gt; DE

GENERATOR -&gt; CAD046866463

FACILITY-&gt; CAT080014079

TRANS 1-&gt; CAD982497158 CALIFORNIA AETC

CHIRON CORPORATION

CALIFORNIA AETC

4560 HORTON STREET

1125 HENSLEY STREET

EMERYVILLE CA 94608-2916

RICHMOND

CA 94801

TRANS 2-&gt;

TRANS 3-&gt;

PAGE/  
LINE

DESCRIPTION

ID #

CONTAINER  
# TYPE

QTY

U  
V

CHEM

FORM

CMPL

1A DOT NM1&gt; WASTE FLAMMABLE LIQUID, NOS

UN1993

3 DF

345

P

17 N

S

Y

DOT NM2&gt;

DOT -&gt;

ADDL -&gt; PLC

HAZ CL-&gt; FLAMMABLE LIQUID

WASTE -&gt; I/T F003/551

OUTGOING-&gt;

1. MANIFEST  
NJA1039511

LN

CNT

DEST

DATE

W.O. #

2F

3

AETNJ

2/20/91

HANDLE-&gt; 14 07 INCINERATION

REJECT-&gt; FROM-&gt;

PAGE/  
LINE

DESCRIPTION

ID #

CONTAINER  
# TYPE

QTY

U  
V

CHEM

FORM

CMPL

1B DOT NM1&gt; WASTE SODIUM CHLORATE

UN1495

1 DF

30

P

17 N

S

DOT NM2&gt;

DOT -&gt;

ADDL -&gt; PLC

HAZ CL-&gt; OXIDIZER

WASTE -&gt; I D001/551

HANDLE-&gt; 14 07 INCINERATION

REJECT-&gt; FROM-&gt;

PAGE/  
LINE

DESCRIPTION

ID #

CONTAINER  
# TYPE

QTY

U  
V

CHEM

FORM

CMPL

1C DOT NM1&gt; WASTE FLAMMABLE SOLID, NOS

UN1325

1 DF

60

P

17 N

S

Y

DOT NM2&gt;

DOT -&gt;

ADDL -&gt;

HAZ CL-&gt; FLAMMABLE SOLID

WASTE -&gt; I F003/551

OUTGOING-&gt;

1. MANIFEST  
NJA1039511

LN

CNT

DEST

DATE

W.O. #

3F

1

AETNJ

2/20/91

HANDLE-&gt; 14 07 INCINERATION

REJECT-&gt; FROM-&gt;



# CAETC DAILY INSPECTION LOG

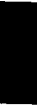
Week of JAN 7 - 11-91

	M	T	W	TH	F
TIME	<u>2900 AM</u>	<u>4:15 P</u>	<u>600 P</u>	<u>7:00 P</u>	<u>5:00 P</u>
NUMBER OF CONTAINERS:					
STORAGE AREA: Flammable	<u>0</u>	<u>0</u>	<u>0</u>	<u>13</u>	<u>29</u>
Oxidizer	<u>0</u>	<u>0</u>	<u>0</u>	<u>11</u>	<u>25</u>
Acid	<u>0</u>	<u>0</u>	<u>0</u>	<u>10</u>	<u>33</u>
Pesticide	<u>0</u>	<u>8</u>	<u>8</u>	<u>23</u>	<u>55</u>
Caustic	<u>1</u>	<u>1</u>	<u>1</u>	<u>19</u>	<u>24</u>
Totals	<u>1</u>	<u>9</u>	<u>9</u>	<u>64</u>	<u>166</u>
ALL CONTAINERS SEALED	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
ANY CONTAINERS LEAKING	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
ANY CONTAINERS SWOLLEN OR BULGED	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
ANY CONTAINERS CONCAVED DUE TO VACUUM BUILD-UP	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
ANY CONTAINERS WITH CORROSION	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
ALL BUNGS ON CONTAINERS CLOSED	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
ALL CONTAINERS PROPERLY LABELED AND IDENTIFIED	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
ANY CRACKS, CORROSION OR SIGNS OF SPILLAGE IN CONTAINER STORAGE AREAS	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
FIRE PROTECTION AND CONTROL EQUIPMENT	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
SECURITY CHECK	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
PERFORMED BY (Initials)	<u>T.O</u>	<u>T.P.</u>	<u>T.O</u>	<u>T.P.</u>	<u>T.P.</u>
DATE	<u>1-7-91</u>	<u>01-08-91</u>	<u>1-9-91</u>	<u>01-10-91</u>	<u>01-11-91</u>

Any abnormalities, malfunctions or problems (date/time/description)? 1-7-91-0900am Pipes to EMERGENCY Showers and Eyewash Busted Plumber CONTACTED, EL ROOTER 686-4477 C1-8-91) Repair Pending 1-9-91-Repair Pending

Remedy, correction action, repairs (date/time/activity)? EYE wash near FLAMMABLE BAY Repaired, EYE WASH near CAUSTIC BAY Part not in STOCK Needed For Repair ORDERED BY EL ROOTER EXPECTED IN 2 TO 3 DAYS Repairs Made 1-10-91

Notification (who was notified and time notification was made)?



# CARTC DAILY INSPECTION LOG

Week of 2-25 → 3-1-91

	M	T	W	TH	F
TIME	<u>4:30pm</u>	<u>5:00pm</u>	<u>4:40pm</u>	_____	_____
NUMBER OF CONTAINERS:					
STORAGE AREA: Flammable	<u>30</u>	<u>30</u>	<u>30</u>	_____	_____
Oxidizer	<u>2</u>	<u>2</u>	<u>2</u>	_____	_____
Acid	<u>4</u>	<u>6</u>	<u>6</u>	_____	_____
Pesticide	<u>16</u>	<u>16</u>	<u>16</u>	_____	_____
Caustic	<u>40</u>	<u>40</u>	<u>47</u>	_____	_____
Totals	<u>92</u>	<u>94</u>	<u>101</u>	_____	_____
ALL CONTAINERS SEALED	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	_____	_____
ANY CONTAINERS LEAKING	<u>NO</u>	<u>NO</u>	<u>NO</u>	_____	_____
ANY CONTAINERS SWOLLEN OR BULGED	<u>NO</u>	<u>NO</u>	<u>NO</u>	_____	_____
ANY CONTAINERS CONCAVED DUE TO VACUUM BUILD-UP	<u>NO</u>	<u>NO</u>	<u>NO</u>	_____	_____
ANY CONTAINERS WITH CORROSION	<u>NO</u>	<u>NO</u>	<u>NO</u>	_____	_____
ALL BUNGS ON CONTAINERS CLOSED	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	_____	_____
ALL CONTAINERS PROPERLY LABELED AND IDENTIFIED	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	_____	_____
ANY CRACKS, CORROSION OR SIGNS OF SPILLAGE IN CONTAINER STORAGE AREAS	<u>NO</u>	<u>NO</u>	<u>NO</u>	_____	_____
FIRE PROTECTION AND CONTROL EQUIPMENT	<u>OK</u>	<u>OK</u>	<u>OK</u>	_____	_____
SECURITY CHECK	<u>OK</u>	<u>OK</u>	<u>OK</u>	_____	_____
PERFORMED BY (Initials)	<u>T.O</u>	<u>T.O</u>	<u>T.O</u>	_____	_____
DATE	<u>2-25</u>	<u>2-26</u>	<u>2-27</u>	<u>2-28</u>	<u>3-1</u>

Any abnormalities, malfunctions or problems (date/time/description)?

Remedy, correction action, repairs (date/time/activity)?

Notification (who was notified and time notification was made)?

TOTAL NUMBER OF GALLONS  
(each bay)

2-27-91	FLAMMABLE		OXIDIZER		CAUSTIC		PESTICIDE		ACID			
	(A)	(B)	(A)	(B)	(A)	(B)	(A)	(B)	(A)	(B)		
85-OP					1	55-G						
115	8	104-G			8	104-G	7	91-G	12	156-G		
60L	12	48-G	6	24-G	27	108-G	13	52-G	14	56-G		
60S	17	17-G	1	1-G	9	9-G	62	62-G	3	3-G		
15-A			2	2-G	1	1-G	2	2-G	10	10-G		
17-H-55	16	880-G			40	2200-G	7	385-G	1	55-G		
17-H-30							1	30-G				
17-E-55	10	550-G			2	110-G	5	275-G	1	55-G		
17-E-30	1	30-G	1	30-G								
5g DM	2	10-G	1	5-G	3	15-G	1	5-G	2	10-G		
10g DM	3	30-G	2	20-G								
TOTALS	69	1669-G	13	82-G	91	2602-G	98	902-G	43	345-G		
TOTAL # 55 gal:		30		2		47		16		6		

\*(A) = # of drums; (B) = total # of gallons (in terms of 55 gallon drums)

CONVERSION TABLE: 115 = 13 gal; 60L = 4 gal; 60S = 1 gal; 15A = 1 gal; 17-H-55 = 55 gal;  
17-E-55 = 55 gal; 17-H-30 = 30 gal; 17-E-30 = 30 gal; 5 gal DM = 5 gal; 10 gal DM = 10 gal.

NC : Total gallons divided by 55 = total # of 55-gallons in bay

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TOTAL NUMBER OF GALLONS  
(each bay)

2-26-91	FLAMMABLE		OXIDIZER		CAUSTIC		PESTICIDE		ACID			
	(A)	(B)	(A)	(B)	(A)	(B)	(A)	(B)	(A)	(B)		
85-OP					1	55-G						
115	8	104-G			8	104-G	7	91-G	12	156-G		
60L	12	48-G	6	24-G	27	108-G	13	52-G	14	56-G		
60S	17	17-G	1	1-G	9	9-G	62	62-G	3	3-G		
15-A			2	2-G	1	1-G	2	2-G	10	10-G		
17-H-55	16	880-G			33	1815-G	7	385-G	1	55-G		
17-H-30							1	30-G				
17-E-55	10	550-G			2	110-G	5	275-G	1	55-G		
17-E-30	1	30-G	1	30-G								
5g DM	2	10-G	1	5-G	3	15-G	1	5-G	2	10-G		
10g DM	3	30-G	2	20-G								
TOTALS	69	1669-G	13	82-G	84	2217-G	98	902-G	43	345-G		
TOTAL # 55 gal:		30		2		40		16		6		

\*(A) = # of drums; (B) = total # of gallons (in terms of 55 gallon drums)

CONVERSION TABLE: 115 = 13 gal; 60L = 4 gal; 60S = 1 gal; 15A = 1 gal; 17-H-55 = 55 gal;  
17-E-55 = 55 gal; 17-H-30 = 30 gal; 17-E-30 = 30 gal; 5 gal DM = 5 gal; 10 gal DM = 10 gal.

NOTE: Total gallons divided by 55 = total # of 55-gallons in bay

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TOTAL NUMBER OF GALLONS  
(each bay)

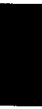
2-25-91	FLAMMABLE		OXIDIZER		CAUSTIC		PESTICIDE		ACID			
	(A)	(B)	(A)	(B)	(A)	(B)	(A)	(B)	(A)	(B)		
85-OP					1	55-G						
115	8	104-G			8	104-G	4	52-G	3	39-G		
60L	12	48-G	6	24-G	27	108-G	13	52-G	14	56-G		
60S	17	17-G	1	1-G	9	9-G	62	62-G	3	3-G		
15-A			2	2-G	1	1-G	2	2-G	10	10-G		
17-H-55	16	880-G			33	1815-G	7	385-G	1	55-G		
17-H-30							1	30-G				
17-E-55	10	550-G			2	110-G	5	275-G	1	55-G		
17-E-30	1	30-G	1	30-G								
5g DM	2	10-G	1	5-G	3	15-G	1	5-G	2	10-G		
10g DM	3	30-G	2	20-G								
TOTALS	69	1669-G	13	82-G	84	2217-G	95	863-G	34	228-G		
TOTAL # 55 gal:		30		2		40		16		4		

\*(A) = # of drums; (B) = total # of gallons (in terms of 55 gallon drums)

CONVERSION TABLE: 115 = 13 gal; 60L = 4 gal; 60S = 1 gal; 15A = 1 gal; 17-H-55 = 55 gal;  
17-E-55 = 55 gal; 17-H-30 = 30 gal; 17-E-30 = 30 gal; 5 gal DM = 5 gal; 10 gal DM = 10 gal.

N : Total gallons divided by 55 = total # of 55- lons in bay





## SAFETY INSPECTIONS

Branch: Richmond Inspector: ALLEN Kroll Date: 2/12/91

Safety inspection will be made monthly by the Safety/Regulatory Administrator. Any deficiency will be noted by the Safety/Regulatory Administrator; it is his responsibility to notify management of the deficiency and to recommend corrective action.

### INSPECTION CHECK LIST

#### Housekeeping

	<u>Yes</u>	<u>No</u>	<u>N/A</u>
1. Are slippery materials removed from floors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are loose objects removed regularly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is there a definite floor cleaning schedule in use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are passageways free of obstructions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Is sufficient space allowed for safe movement of warehouse vehicles and machinery?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are aisles clearly marked for safe movement of people and materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Are all materials piled in an orderly manner?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Are materials stored in properly designated places?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Are trucks left in safe position?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Are windows and skylights clean?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Are lighting fixtures, reflectors, and bulbs clean and in good repair?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Are tools properly used and stored?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Is there sufficient room between machinery for their safe operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Are there some operations which would make for better housekeeping if they were isolated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15. Are lockers provided for personal belongings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Fire Prevention

- |  | Yes | No | N/A |
|--|-----|----|-----|
| 16. Are smoking areas approved?  | ✓   | —  | —   |
| 17. Are "No Smoking" signs posted in unauthorized areas?                             | ✓   | —  | —   |
| 18. Are flammable liquids in safety containers?                                      | ✓   | —  | —   |
| 19. Are fire doors self-closing?   | ✓   | —  | —   |
| 20. Are hazardous operations isolated?   | ✓   | —  | —   |
| 21. Are all containers from which flammable liquids are poured, bonded and grounded? | ✓   | —  | —   |

### Fire Hazards

- |   |   |   |   |
|---|---|---|---|
| 22. Are oily rags and waste placed in covered metal containers? | ✓ | — | — |
| 23. Is electrical or fire equipment free of obstruction?        | ✓ | — | — |

### Fire Protection

- |   |   |   |   |
|---|---|---|---|
| 24. Is fire alarm in working order?   | ✓ | — | — |
| 25. Are sufficient fire extinguishers provided?   | ✓ | — | — |
| 26. Are fire extinguishers properly charged?  | ✓ | — | — |
| 27. Have personnel been instructed in use of fire equipment?  | ✓ | — | — |
| 28. Are fire extinguishers up to date in inspections (maximum one year)?                            | ✓ | — | — |
| 29. Does sprinkler system cover all areas?  | — | — | ✓ |
| 30. Is there a minimum clearance of 18" under sprinklers?   | — | — | ✓ |
| 31. Are sprinkler heads free from corrosion?  | — | — | ✓ |
| 32. If sprinkler system is not in a heated room, is it a dry system or does it contain anti-freeze? | — | — | ✓ |
| 33. Are sprinkler valves open?  | — | — | ✓ |

### Electrical

Yes No N/A

34. Are portable electric tools three-wire grounded?

☒

☐

☐

35. Are fixed electrical motors three-wire grounded?

☐

☐

☒

36. Is all wiring permanent?

☐

☒

☐

37. Is emergency power generator in working order?

☐

☐

☒

38. Is emergency lighting in working order?

☐

☐

☒

39. Are electrical boxes closed?

☒

☐

☐

40. Is electrical wiring in good condition?

☒

☐

☐

41. Are flexible cords in good repair?

☒

☐

☐

42. Are electrical switches in good repair with covers in place?

☐

☒

☐

43. Is the electrical equipment in hazardous locations of the proper type?

☒

☐

☐

44. Is electrical equipment shut off and locked when undergoing repairs?

☒

☐

☐

45. Is electrical security system working?

☒

☐

☐

### Chemical Storage

46. Is the supply of flammable liquids excessive?

☐

☒

☐

47. Are the containers properly and completely labeled?

☐

☒

☐

48. Are containers sealed properly?

☐

☒

☐

49. Are containers in good repair?

☐

☒

☐

50. Is the location where toxic chemicals are kept well ventilated?

☐

☒

☐

51. Are all containers placed in a good storage area?

☐

☒

☐

52. Are the poisonous materials stored properly?

☐

☒

☐

53. Are all containers compatible?

☐

☒

☐

	<u>Yes</u>	<u>No</u>	<u>N/A</u>
54. Are the poisonous materials containers of good integrity and correctly labeled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
55. Are all flammable/combustible materials stored properly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56. Are the flammable/combustible materials containers of good integrity and correctly labeled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
57. Are all corrosive materials stored properly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
58. Are the corrosive materials containers of good integrity and correctly labeled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
59. Are all EHS materials stored properly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
60. Are the EHS materials containers of good integrity and correctly labeled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
61. Is the general ventilation sufficient?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
62. Are containers of the approved type?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
63. Is EHS air monitoring equipment with alarms operational?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### PERSONAL PROTECTION APPAREL

64. Is the proper personal protective apparel available (apron, gloves, face shield, disposable respirators)?

☒ ☐ ☐

#### Eye Protection

65. Are employees wearing proper eye protection?

☒ ☐ ☐

#### Body Protection

66. Are there adequate supplies of fire protective clothing?

☐ ☒ ☐

67. Are there adequate supplies of chemical protective clothing?

☒ ☐ ☐

68. Are all employees requiring body protection utilizing this equipment?

☒ ☐ ☐

69. Are employees free of loose sleeves, tails, ties, lapels, cuffs, finger rings or other loose clothing?

☒ ☐ ☐

### Foot Protection

Yes

No

N/A

70. Are all employees requiring foot protection utilizing this equipment?

✓

—

—

### Hand Protection

71. Are all employees requiring hand protection utilizing this equipment?

✓

—

—

### Respiratory Protection

72. Are all SCBA systems in working order (air tank, bypass valve, alarms, etc.)?

✓

—

—

73. Are all supplied air breathing systems and air lines of good integrity?

✓

—

—

74. Are respirators in sanitary condition and in good repair?

✓

—

—

75. Are all employees requiring respiratory protective equipment utilizing this equipment?

✓

—

—

76. Are harness and life lines used in confined spaces?

—

—

✓

77. Is a supplementary air supply used in confined spaces?

—

—

✓

78. Are stationary eye wash/shower units free of obstruction?

✓

—

—

79. Are eye wash/shower units in working order?

✓

—

—

80. Are all standard industrial adsorbents (vermiculite, speedi-dry, etc.) in stock?

✓

—

—

81. Are all absorbent booms and pads in stock?

✓

—

—

82. Are all portable drum pumps free of clogs and in working order?

✓

—

—

83. Are there adequate supplies of full-face chemical cartridge respirators with cartridges?

✓

—

—

84. Are there adequate supplies in the first aid cabinets?

✓

—

—

## OPERATING EQUIPMENT

### Fork Lift

	<u>Yes</u>	<u>No</u>	<u>N/A</u>
85. Is canopy guard in position?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
86. Do brakes work properly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
87. Does the horn work?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Trailers

88. Are all trailers flat and even?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
89. Are all trailers free of soft tires, leaking, and signs of spills?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Drum Trucks and Pallet Jacks

90. Are all drum trucks and pallet jacks in good working order?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
91. Are all ramps free of corrosion and obstacles?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Loading Dock

92. Are loading docks free of corrosion on supports?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
93. Are loading docks free of cracks and uneven settling?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
94. Are there adequate supplies of DOT specified containers (i.e., drums, boxes)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Compressed Gas

95. Are gas cylinders secured by chain or strap?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------	--------------------------

## BUILDING CONDITIONS

### Exits

96. Do exit doors swing in the direction of exit travel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
97. Are exit doors free from damage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
98. Are the exit doors unlocked from the inside?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
99. Are fire doors free to self-close?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
100. Are doorways clear?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<u>Floors</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>
---------------	------------	-----------	------------

101. Are floors overloaded?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
-----------------------------	--------------------------	-------------------------------------	--------------------------

102. Are floors free from potholes, cracks, and warping?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------	--------------------------

Walls

103. Are walls free from damage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
----------------------------------	-------------------------------------	--------------------------	--------------------------

Stairway

104. Do stairways have handrails?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-----------------------------------	-------------------------------------	--------------------------	--------------------------

105. Are handrails in good repair?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
------------------------------------	-------------------------------------	--------------------------	--------------------------

106. Are stairways' treads in good repair?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------	--------------------------

107. Are stairways clear?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
---------------------------	-------------------------------------	--------------------------	--------------------------

WORKING CONDITIONS

Sanitation

108. Are toilet facilities clean and in good working order?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
---	-------------------------------------	--------------------------	--------------------------

109. Are washing facilities clean and in good working order?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------	--------------------------

110. Are eating facilities clean?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-----------------------------------	-------------------------------------	--------------------------	--------------------------

111. Is lighting adequate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
----------------------------	-------------------------------------	--------------------------	--------------------------

112. Are windows and skylights used for natural lighting clean?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
---	-------------------------------------	--------------------------	--------------------------

Miscellaneous

113. Are rails around floor openings in good repair?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------

114. Are all fences free of corrosion and damage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
---	-------------------------------------	--------------------------	--------------------------

115. Are all locks free of corrosion and damage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------	--------------------------

116. Are all warning signs free of corrosion and damage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------	--------------------------

117. Is paving free of cracks and potholes, etc.?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
---	-------------------------------------	--------------------------	--------------------------

118. Are all drains boomed and closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------	--------------------------



COMMENTS/RECOMMENDED CORRECTIVE ACTION:

- 11, Per OSHA requirements, some electrical work must be done (see report)
- 16 smoking outside facility grounds
- 29-33, no sprinkler systems employed
- 36 see comments 11
- 42 see comment 11
- 43 Flammable gas outlet is not explosion proof but is disarmed
- 66 no nomenclature gear available
- 76+77 no confined space service work done here

C. Allen Hall

Inspector's Signature

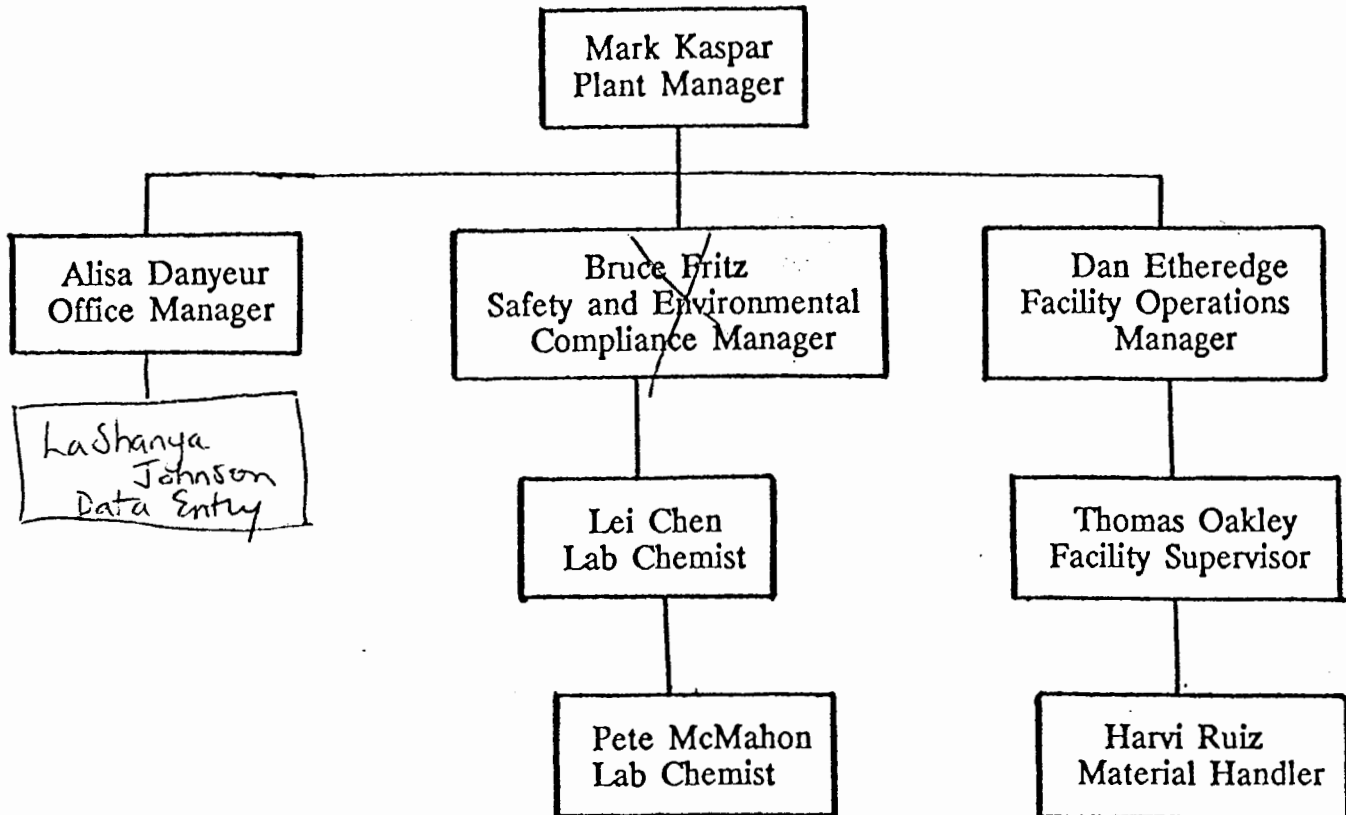
2/12/91

Date





CAETC - RICHMOND FACILITY





**GENERATORS OF HAZARDOUS WASTE**  
**CEI Checklist**

SITE ID# CAT 080014079 INSPECTION DATE: 2-28-91

SITE NAME: CAETC (California Advanced Environmental Technology Corporation)

LOCATION: 1125 Hensley Street

RICHMOND  
City

CA 94801  
State Zip

LEAD INSPECTOR: Bonnie Griffith

OFFICE: Region 2

TYPE OF INSPECTION: GENERATOR ONLY ☒

GENERATOR PORTION OF CEI ☒

OTHER \_\_\_\_\_

**INDEX FOR GENERATOR CHECKLIST**

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NOTE: This checklist is designed to be used with the regulations, not to replace them. You should understand the cited section before answering the question. Sections cited are shown in brackets, with the number before the slash being the State citation and the number after the slash being the Federal citation: [State/Federal]. A dash only on one side of the slash indicates there is no corresponding State or Federal citation.

2

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
--	------------	-----------	----------------

Generators - General

Has the generator of solid wastes made a hazardous waste (H.W.) determination by determining if the waste is:

✓

Excluded from regulation under 261.4?  
[-/262.11(a)]

✓

Listed as a H.W. in CCR Articles 9 & 11 or 261 Subpart D?  
[66471(a)/262.11(b)]

✓

Exhibits characteristic identified in Article 11, CCR/261 Subpart C, by either: [66471(b)-/261.11(c)-]

(1) Testing the waste?

✓

(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the process used?

✓

Excluded or restricted under 264, 265, or 268, if determined hazardous?  
[-/262.11(d)]

✓

Note: See Part 268 checklist for Land Ban restricted wastes generator requirements.

Has the generator applied for and obtained an EPA ID number before treating, storing, disposing of, transporting, or offering for transport their H.W.? [66472(a)&(d)/262.12(a)]

✓

Have they offered H.W. only to transporters or TSDs with an EPA ID#?  
[66472(c)/262.12(c)]

✓

Generator does not handle or dispose of extremely hazardous waste except in compliance with a permit from the Department? [66570/-]

✓

Yes No Comment

### Manifests

Does the generator: [66480-/262.20-]  
(a) [& 66481(b)] Does the generator  
prepare a complete manifest according  
to the instructions (see Part 262  
Appendix) before transporting H.W.  
off-site?

✓

(b) Does the generator designate on  
the manifest one facility which is  
permitted to handle the H.W.?

✓

(d) If delivery to designated facility  
is prevented, has the generator  
designated another facility or  
instructed transporter to return waste?

✓

Did the generator use the supplied  
manifest required by a consignment  
State: [-/262.21-]

(a) Where the receiving facility is?  
or, if not provided by that State:

✓

(b) Where the generating facility is?

✓

(c) If not provided by either State,  
the EPA form from any source?

✓

Did the generator use the manifest  
specified by the Department?  
[66481(a)/-]

✓

Did each manifest contain all required  
information? [66482/-]

✓

Did the manifest consist of enough  
copies? [-/262.22]

✓

Did the generator:  
[66484(a)-/262.23(a)-]

(1) Sign the manifest by hand?

✓

(2) Obtain the signature of initial  
transporter and date of acceptance on  
manifest?

✓

(3) Keep two copies of the manifest  
(per 66492(b)/262.40(a))?

✓

Did the generator give the remaining  
copies of the manifest to the  
transporter? [66484(b)/262.23(b)]

✓

If the shipment was sent by water or  
rail, was 66484/262.23 complied with?  
[66484(c&d)/262.23(c&d)]

N/A



Yes No Comment

Manifests - Continued

Has the generator submitted a legible copy of each manifest to the Department within 30 days? [25160 & 66484(f)/-]

IN COMING AND OUTGOING INSTALL  
MANIFESTS AND TOTAL SHIPMENTS  
SENDS MANIFEST ATTENDANT  
EACH MONTH

Pre-Transport Requirements

Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? [66504(a)/262.30]

✓

Are waste packages labelled in accordance with DOT regulations (40 CFR 172.101)? [66504(b)/262.31]

✓

Are containers marked in accordance with DOT regulations (49 CFR 172.101)? [66504(b)/262.32(a)] including:

✓

Proper shipping name (table column 2)?

✓

Proper ID number (table column 3A)?

✓

Proper ORM designation for containers of ORM-A, B, C, D or E wastes?

✓

Are containers of 110 gallons or less marked with the following words? [66504(c)/262.32(b)]

✓

HAZARDOUS WASTE-Federal Law prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generators Name & Address \_\_\_\_\_  
Manifest Document Number \_\_\_\_\_

Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? [66504(b)/262.33]

✓

Yes No Comment

Generation Points ("Satellite")

The generator may accumulate H.W. at or near the point of initial generation without meeting storage deadlines if:

N/A

They accumulate no more than 55 gallons of H.W. or one quart of acutely or extremely H.W.?  
[25123.3(d)(1)/262.34(c)(1)]

The waste is stored in containers?  
[25123.3(d)(2)/-]

The waste is stored for no more than one year, nor more than 90 days from reaching the quantity limits?  
[25123.3(d)(3)/-]

The container is labelled with the initial date of accumulation and with the words "Hazardous Waste" or other words identifying the contents?  
[25123.3(d)(4)/262.34(c)(1)(ii)]

Within three days of reaching any quantity limit above, has the generator labelled the container with the date the quantity limit was reached and complied with 66508(a)/262.34(a)?  
[25123.3(d)(5)/262.34(c)(2)]

The container is in good condition, is compatible with the waste, is kept closed when H.W. is not being added or removed?  
[25123.3(d)(6)/262.34(c)(1)(i)]

They are not otherwise a storage facility? [25123.3(d)(7)/-]

90 Day Storage

If the generator does not have interim status (as a TSD facility) have they accumulated H.W. on-site for less than 90 days? [66508(a)/262.34(a)]

Permitted Facility  
Can store up to 1 year

N/A

NOTE: For generators of less than 100 kg/mo., the 90 days starts when 100 kg has been accumulated. (Reference 25123.3/-)

Yes No Comment

If the generator has stored H.W. on-site for more than 90 days\*, have they:  
[66508(b)/262.34(b)]

Been granted an extension? or: \_\_\_\_\_

Complied with the 40 CFR Parts 264 and 265 and the permitting requirements in Part 270? ☒ \_\_\_\_\_

*Submitted NEW PART A AND B PERMIT APPLICATION ON JAN 7, 1991.*

\* Except at the point of initial generation in compliance with 25123.3(d)/262.34(c). (see "Generation Points", Page 6)

Is each container or tank clearly marked with the words "Hazardous Waste"?  
[66508(a)(3)/262.34(a)(3)] ☒ \_\_\_\_\_

Generators accumulating waste in containers  
Reference 66508(a)(1)/262.34(a)(1)

Are containers visibly marked with the date accumulation started?  
[66508(a)(2)/262.34(a)(2)] ☒ \_\_\_\_\_

Does each container have a label which includes the following information: [66508(c)-/-]

- (1) Composition and physical state of the waste? ☒ \_\_\_\_\_
- (2) Statement(s) on the hazardous property(ies) of the waste? ☒ \_\_\_\_\_
- (3) Name and address of the waste generator? ☒ \_\_\_\_\_

Does the generator transfer wastes from containers in poor condition to sound containers, or otherwise manage the waste in compliance with regulations? [67241/265.171] ☒ \_\_\_\_\_

Containers are compatible with the waste to be stored? [67242/265.172] ☒ \_\_\_\_\_

Are containers of H.W. closed except when necessary to add or remove wastes? [67243(a)/265.173(a)] ☒ \_\_\_\_\_

Are containers of H.W. handled to prevent rupture and leakage?  
[67243(b)/265.173(b)] ☒ \_\_\_\_\_

Does the generator inspect container storage areas at least weekly?  
[67244/265.174] ☒ \_\_\_\_\_

Yes No Comment

Generators accumulating waste in containers - Continued

Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the property line? [67246/265.176]

✓

Incompatible wastes or wastes and materials are not placed in the same container unless proper precautions (per 67106(b)/265.17(b) are taken? [67247(a)/265.177(a)]

✓

H.W. is not placed in an unwashed container that previously held an incompatible waste or material? [67247(b)/265.177(b)]

✓

Containers holding H.W. that is incompatible with wastes or materials stored nearby is separated or protected by dikes, berms, walls or other device? [67247(c)/265.177(c)]

✓

Generators accumulating waste in tanks  
Reference 66508(a)(1)/262.34(a)(1)

*FACILITY DOES NOT STORE IN TANKS*

If the generator accumulates RCRA H.W. in tanks, and generates over 1000 kg/mo of RCRA H.W., include CEI checklist for 40 CFR 265 Subpart J, except for 265.197(c) and 265.200.

Proper precautions (per 67106(b)) are taken for storage of ignitable, reactive or incompatible wastes in tanks? [67257(a)/-]

*N/A*

H.W. is not placed in tanks if it could cause the tank and/or liner to fail before the end of its intended life? [67257(b)/-]

*N/A*

Uncovered tanks are maintained with 2 ft. of freeboard, unless a containment system with a capacity of that 2 ft. is maintained? [67257(c)/-]

*N/A*

If waste is continuously fed into a tank, it is equipped with a means to stop that inflow? [67257(d)/-]

*N/A*

When a tank is used to store a waste which is substantially different from a waste previously stored in a tank, the generator takes required precautions? [67258/-]

*N/A*

Yes No Comment

Generators accumulating waste in tanks - Continued

Does the generator inspect: [67259(a)-/-]

(1) Discharge control equipment  
each operating day?

\_\_\_\_\_  
N/A

(2) Data from monitoring  
equipment each operating day?

\_\_\_\_\_  
N/A

(3) The level of waste in the  
tank each operating day?

\_\_\_\_\_  
N/A

(4) Tank construction materials  
weekly for corrosion and leaks?

\_\_\_\_\_  
N/A

(5) Discharge confinement  
structure and area weekly for  
erosion or leaks?

\_\_\_\_\_  
N/A

If a tank has been closed, were all  
H.W. and constituents removed from  
tank and appurtenances, and was all  
contamination removed? [67260/-]

\_\_\_\_\_  
N/A

Ignitable or reactive wastes are not  
placed in a tank unless proper  
precautions are taken? [67261(a)-/-]

\_\_\_\_\_  
N/A

Tank storage of ignitable or reactive  
waste meets NFPA buffer zone  
requirements? [67261(b)-/-]

\_\_\_\_\_  
N/A

Incompatible wastes or wastes and  
materials are not placed in the same  
tank, or in a tank which previously  
held an incompatible waste or  
material, unless proper precautions  
(per 67106(b)) are taken? [67262/-]

\_\_\_\_\_  
N/A

Volume of waste in single tank does  
not exceed 5,000 gals. or 45,000 lbs.  
unless generator has a permit, or it is  
a portable tank holding H.W. for 60 days  
or less from onsite maintenance which  
is performed less than annually?  
[25123.3(a)(2)-/-]

\_\_\_\_\_  
N/A

Yes No Comment

# Recordkeeping and Reporting

Are the following kept for at least three years: [66492-/262.40-]

(a) Manifest signed by the receiving facility? ☒

(b) Biennial Reports and Exception Reports? ☐

(c) Test results, waste analysis or other determinations made in accordance with 66471/262.11? ☐

If the facility has shipped any waste off-site to a U.S. TSD, have they submitted a Biennial Report to the Department/RA by March 1 of each even numbered year? [66493(a)/262.41(a)] ☐

Does the report include the following information? [66493(a)-/262.41(a)-]

(1) EPA ID No., name and address of the generator? ☐

(2) Calendar year covered by the report? ☐

(3) The EPA ID No., name, and address for each off-site U.S. TSD to which H.W. was shipped during the year? ☐

(4) Name and EPA ID No. of each transporter used during the year to ship to a U.S. TSD? ☐

(5) Description, CA/EPA hazardous waste No., DOT hazard class and quantity of each H.W. shipped off-site to a U.S. TSD? ☐

Was this information listed by EPA ID No. of each off-site U.S. TSD to which H.W. was shipped? ☐

(-/6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated? ☐

(-/7) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (back to 1984 if available)? ☐

(6/8) The signed certification? ☐

For a generator that has not received a signed copy of the manifest from the designated facility within 35 days, has the generator determined the status of the H.W.? [66484(g)/262.42(a)] ☐

N/A NO ANNUAL REPORT REQUIRED FOR 1990

N/A Currently not doing waste analysis on site - use Generator's knowledge, analysis etc.

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

Yes No Comment

Recordkeeping and Reporting - Continued

For a generator that has not received a signed copy of the manifest within 45 days, has the generator submitted an Exception Report to the RA?  
[66484(g)/262.42(b)]

XXXX

N/A

Did the Exception Report include:  
[66484(g)(1)/262.42(b)(1)]

- (1) A legible copy of the manifest?
- (2) A signed cover letter explaining the efforts taken to locate the H.W. and the results of these efforts?

Has the generator submitted an annual report to the Board of Equalization?  
[25342/-]

Training

Have facility personnel successfully completed H.W. training program which is directed by a qualified person, and which addresses all required topics?  
[67105(a)/265.16(a)]

✓

Have personnel completed the required training within 6 mos after their employment date, and not worked unsupervised until completing the training? [67105(b)/265.16(b)]

✓

Have personnel taken part in an annual review of initial training?  
[67105(c)/265.16(c)]

N/A CHETC IN OPERATION SINCE 11/15/91

Do personnel records include for each H.W. position: [67105(d)-/265.16(d)-]

- (1) Job title and name of person filling the position?
- (2) Job description?
- (3) Description of required training?
- (4) Documentation that training or experience has been completed?

✓

✓

✓

✓

Are personnel records kept for current employees until closure, and past employees for at least three years?  
[67105(e)/265.16(e)]

✓

Yes No Comment

### Preparedness and Prevention

Is the facility maintained and operated to minimize the possibility of fire, explosion, or releases of H.W. or H.W. constituents to air, soil, or surface water which could threaten human health or the environment? [67120(a)/265.31]

✓

Does the facility have the following equipment, where applicable:  
[67121-/265.32-]

(a) An internal communications or alarm system capable of providing emergency instructions to personnel?

✓

ORDERED 2-WAY RADIOS  
use "Bubble System"

(b) Telephone or 2-way radios for summoning assistance?

✓

(c) Fire control, spill control, and decontamination equipment?

✓

(d) Water at adequate volume and pressure, foam producing equipment, or automatic sprinklers?

N/A

Are all emergency systems and equipment tested and maintained in operable condition? [67122/265.33]

✓

Tested daily

Do all personnel in H.W. handling areas have immediate access to alarm or communication device?  
[67123(a)/265.34(a)]

✓

If personnel handle H.W. alone, do they have immediate access to a device capable of summoning outside assistance? [67123(b)/265.34(b)]

✓

IF working in bag system

Is there adequate aisle space for unobstructed movement of personnel and emergency equipment? [67124/265.35]

✓

Has the facility attempted to make the following arrangements, as appropriate: [67126(a)-/265.37(a)-]

(1) To familiarize police, fire depts. and other emergency responders with H.W. operations and facility layout?

✓

(2) If more than one responder, designating primary authority?

✓

(3) Agreements with emergency response teams, contractors and suppliers?

✓

(4) To familiarize local hospitals with properties of wastes handled and potential injuries or illnesses?

✓



Yes No Comment

Preparedness and Prevention - Continued

ALL LETTERS OF AGREEMENT  
WERE SIGNED

Has the facility documented any  
refusal to enter into such arrangement?  
[67126(b)/265.37(b)]

✓

Contingency Plan and Emergency Procedures

Does the facility have a contingency  
plan designed to minimize hazards from  
H.W. incidents? [67140(a)/265.51(a)]

✓

Have the provisions of the plan been  
carried out immediately when there is  
a H.W. incident which could threaten  
human health or the environment?  
[67140(b)/265.51(b)]

NIA

Does the plan describe action personnel  
must take to respond to emergencies?  
[67141(a)/265.52(a)]

✓

Does the plan describe the arrangements  
agreed to in 67126/265.37?  
[67141(c)/265.52(c)]

✓

Does the plan list names, addresses and  
phone numbers (office and home) of all  
qualified ECs, and name one as primary  
EC with the others listed in order of  
responsibility? [67141(d)/265.52(d)]

✓

Does the plan list all emergency  
equipment including the location,  
physical description, and outline of  
capabilities? [67141(e)/265.52(e)]

✓

Does the plan include an evacuation  
plan with signals to begin evacuation,  
evacuation routes and alternate routes?  
[67141(f)/265.52(f)]

✓

Is a copy of the plan, and all revisions  
to the plan: [67142-/265.53-]

(a) Maintained at the facility?

✓

(b) Submitted to all entities with  
designated response rolls?

✓

EACH COORDINATOR HAS ONE  
COPY OF CP FOR REVIEW.

Yes No Comment

Contingency Plan and Emergency Procedures - Continued

Has the plan been reviewed and immediately amended whenever: [67143-/265.54-]

(b/a) Applicable regulations are revised?

(c/b) The plan fails in an emergency?

(d/c) Facility changes require it?

(e/d) The list of emergency coordinators changes?

(f/e) The list of emergency equipment changes?

N/A

N/A CAETC HAS NOT HAD TO IMPLEMENT  
N/A PLAN

✓ Will send letter regarding  
✓ Replacement of Scott's  
W/ MSA's.

Is there at all times at least one employee at the facility, or close by and on call, designated as EC, who is thoroughly familiar with all facility operations, wastes, records, layout, and emergency procedures, who has authority to commit the resources to carry out the contingency plan?  
[67144/265.55]

✓

If an emergency has occurred at this facility, did the EC comply with all required emergency procedures?  
[67145/265.56]

N/A NO Emergency has  
occurred.

Yes   No   Comment

Farmers

A farmer disposing of waste pesticides is not required to comply with Part 262 generator standards or Parts 264, 265, 268, or 270 for those wastes provided: [66300(e)(5)/262.70]

N/A

The pesticides are from their own use?

They triple rinse each pesticide container in accordance with 261.7(b)(3)?

They dispose of the residues on their own farm in a manner consistent with the disposal instructions on the pesticide label?

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Yes No Comment

Exports of RCRA Hazardous Waste

Exports of RCRA H.W. are prohibited unless: -[-/262.52-]

(a) Notification (262.53) has been provided?

N/A

(b) The receiving country has consented to accept the waste?

N/A

(c) A copy of the EPA Acknowledgment of Consent accompanies the shipment, and is attached to the manifest or shipping paper?

N/A

(d) The H.W. shipment conforms to the receiving country's written terms in the EPA acknowledgment of Consent?

N/A

Did the primary exporter of H.W. notify the EPA each calendar year of intended exports? [-/262.53(a)]

N/A

Was the notification at least 60 days before the intended date of the initial off-site shipment for the calendar year? [-/262.53(a)]

N/A

Did the notice signed by the primary exporter include his name and address and the following information, by consignee, for each H.W. type: [-/262.53(a)(1), (2)-]

(i) A description of the H.W., the EPA waste identification no. and the DOT shipping description (in 40 CFR 171-177)?

N/A

(ii) The estimated frequency and time span of exportation?

N/A

(iii) The estimated total quantity?

N/A

(iv) All points of entry to and departure from each foreign country the H.W. will pass through?

N/A

(v) How the waste will be transported (type of vehicles and containers)?

N/A

(vi) A description of how the waste will be treated, stored, or disposed of in the receiving country?

N/A

(vii) The name and site address of the foreign consignee(s)?

N/A

(viii) The name of each country the H.W. will pass through, for how long it will remain there, and how it will be handled during that time?

N/A

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
<u>Exports of RCRA Hazardous Waste -Continued</u>			
Was the export notification marked "Attention: Notification to Export" and sent to: Office of International Activities (A-106) EPA, 401 M St. SW., Washington DC 20460? [-/262.53(b)]	_____	_____	N/A
Has the primary exporter not shipped waste until the notification was correct and an EPA Acknowledgment of Consent was received? [-/262.53(c)]	_____	_____	N/A
Does the exporter meet the requirements for use of the manifest, except that: [-/262.54-]	_____	_____	N/A
(a-b) The name and address of the foreign consignees are substituted for the name, address and EPA ID No. of the designated facilities?	_____	_____	N/A
(c) The generator identifies the point of departure from the U.S. under Special Handling Instructions and Additional Information?	_____	_____	N/A
(d) The phrase "and conforms to the terms of the attached EPA Acknowledgment of Consent" is added to the end of the first sentence in the certification?	_____	_____	N/A
(e) The primary exporter's appropriate State manifest is used where required?	_____	_____	N/A
(f) The primary exporter requires that the consignee confirm delivery of H.W. in the foreign country (e.g., manifest signed by foreign consignee and returned to generator)?	_____	_____	N/A
(g)- If the shipment could not be delivered to the consignees, did the primary exporter:	_____	_____	
(1) Renotify the EPA, request approval of shipment to a new consignee, and obtain a new EPA Acknowledgment of Consent prior to delivery? or:	_____	_____	N/A
(2) Instruct the transporter to return the shipment to the U.S.? and:	_____	_____	N/A
(3) Instruct the transporter to revise the manifest accordingly?	_____	_____	N/A
(h) A copy of the EPA Acknowledgment of Consent accompanies the shipment, and is attached to the manifest or shipping paper?	_____	_____	N/A
(i) The primary exporter provides an extra manifest copy for the transporter to give to U.S. Customs?	_____	_____	N/A

Yes No Comment

Exports of RCRA Hazardous Waste -Continued

Did the primary exporter file and  
Exception Report if: [-/262.55-]

(a) A signed copy of the manifest  
from the transporter stating date and  
place of departure from U.S. had not  
been received in 45 days?

N/A

(b) A written confirmation from the  
foreign consignee had not been  
received within 90 days?

N/A

(c) The waste was returned to the  
U.S.?

N/A

Has the facility submitted an Annual  
Report to the RA by March 1 of each  
year, summarizing the types, frequency,  
quantity, and ultimate destination of  
all H.W. exported during the previous  
calendar year? [-/262.56(a)]

N/A

Did the report include the following  
information: [-/262.56(a)-]

(1) EPA ID No., name, mailing and  
site address of the exporter?

N/A

(2) Calendar year covered by the  
report?

N/A

(3) The name and site address of  
each consignee?

N/A

(4) Description, EPA hazardous waste  
No., DOT hazard class and quantity of  
each H.W. shipped to each consignee, the  
name and ID No. of each transporter, the  
total amount of waste shipped and the  
number of shipments pursuant to each  
notification?

N/A

(5) Except for 100-1000 kg/mo generators,  
each even numbered year:

(i) A description of the efforts  
undertaken during the year to reduce  
the volume and toxicity of waste  
generated? and:

N/A

(ii) A description of the changes in  
volume and toxicity actually achieved  
during the year in comparison to  
previous years (prior to 1984 if  
available)?

N/A

Yes   No   Comment

Exports of RCRA Hazardous Waste -Continued

[-/262.56(a)-] - continued

(6) A signed certification which states:

N/A

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Was the annual report sent to: Office of International Activities (A-106), EPA, 401 M Street SW., Washington DC 20460?

N/A

Did the primary exporter keep for at least three years a copy of each: [-/262.57(a)-]

(1) Notification of intent to export (from the date the H.W. was accepted)?

N/A

(2) EPA Acknowledgment of Consent (from the date the H.W. was accepted by the initial transporter)?

N/A

(3) Confirmation of delivery (from the date the H.W. was accepted by the initial transporter)?

N/A

(4) Annual report (from the due date)?

N/A

Yes No Comment

Exports of Hazardous Waste

Has the H.W. exporter complied with requirements of Article 6 and 66515? [66515(a)/-]

N/A

When exporting H.W., has the generator: [66515(b)-/-]

(1) Notified EPA and the Department four weeks before the initial shipment to each country for each calander year:

(A) EPA waste code and DOT shipping description?

N/A

(B) Name and address of foreign consignee?

N/A

(C) Sent notice to proper EPA office and to the Department?

N/A

(2) Required that the foreign consignee confirm delivery?

N/A

(3) Use the name and address of the foreign consignee in place of the designated facility, and identify the point of departure from the U.S. on the manifest?

N/A

Has the exporting generator filed an exception report when: [66515(c)-/-]

(1) He has not received a copy of the manifest signed by the transporter stating the date and place of U.S departure within 45 days from acceptance by the initial transporter?

N/A

(2) He has not received written confirmation of waste receipt by the foreign consignee?

N/A



Land Disposal Restrictions:  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listings)			
F001 through F005 spent solvents?	<input checked="" type="checkbox"/>		
F020 through F026-28 Dioxins?	<input checked="" type="checkbox"/>		
"California List" wastes?	<input checked="" type="checkbox"/>		
First Third scheduled wastes?	<input checked="" type="checkbox"/>		
Second Third scheduled wastes?	<input checked="" type="checkbox"/>		

Exemptions: Are the prohibited wastes exempted from land disposal restrictions because:

The waste is from conditionally-exempt small quantity generators? 268.1(c)(4) ☒ \_\_\_\_\_

A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(c)(5) \_\_\_\_\_ N/A

An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d) \_\_\_\_\_ N/A

If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

Exceptions: Can the restricted wastes continue to be land disposed because:

A case-by-case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1)(all), \_\_\_\_\_ N/A  
268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins),  
268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)(2nd 3rd), 268.1(c)(2)

An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a) \_\_\_\_\_ N/A

\*Land disposal means placement in or on the land, including a landfill, surface impoundment, waste pile, land treatment facility, salt dome formation, underground mine or cave, injection well, or placement in a concrete vault or bunker for disposal. 268.2(a) Injection wells are being covered under a separate schedule.

Land Disposal Restrictions:- Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
A generator certifies a good-faith effort in compliance with 268.8 "soft-hammer" regulations? 268.1(c)(5)	<input checked="" type="checkbox"/>		N/A

If any of the preceding exceptions apply, the attached effective 268 Subpart C dates and concentrations, Subpart D standards and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.

Has the handler not merely diluted the restricted waste or treatment residue in order to achieve compliance? 268.3	<input checked="" type="checkbox"/>		
--	-------------------------------------	--	--

Storage:

Are restricted wastes only being stored where: 268.50-

(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?	<input checked="" type="checkbox"/>		
---	-------------------------------------	--	--

(a)(2) A TSD is accumulating a batch as above? and:	<input checked="" type="checkbox"/>		
---	-------------------------------------	--	--

(i) Each container is marked with the contents and accumulation start date?	<input checked="" type="checkbox"/>		
---	-------------------------------------	--	--

(ii) Each tank is marked with the contents, accumulation start date, quantity of HW, and/or the information is in the operating record?	<input checked="" type="checkbox"/>		
---	-------------------------------------	--	--

(c) The TSD can <u>prove</u> that any storage over one year was solely for the purpose of necessary accumulation? or:	<input checked="" type="checkbox"/>		
---	-------------------------------------	--	--

(d) The wastes are subject to an approved no-migration petition, case-by-case extension, a nation wide variance, or a valid "soft hammer" 268.8 certification?	<input checked="" type="checkbox"/>		
--	-------------------------------------	--	--

(e) The stored wastes already meet any applicable treatment, concentration, or waiver standards?	<input checked="" type="checkbox"/>		
--	-------------------------------------	--	--

(f) After 7/8/87, are liquid HW over 50 ppm PCBs stored for less than a year, and in a 761.65(b) (TSCA) complying storage area?	<input checked="" type="checkbox"/>		
---	-------------------------------------	--	--

See p. 268:8 for off-site storage facility record keeping requirements.

Land Disposal Restrictions:- Continued  
(Part 268)

Generators: Waste Analysis

Yes   No   Comments

If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal?

268.7(a) ☒

Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i) ☒

Did the generator determine if liquid CA list wastes sludges and solids were CA list liquids? 268.32(j)(1) ☒

Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2) ☒

Did the generator determine whether a HW listed in 268.10, -.11, -.12, exceeds the applicable treatment standards specified in 268.44 & -.43 by testing a representative sample of the waste extract or the entire waste, or use knowledge of the waste? 268.34(i)(2) ☒

Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g) ☒

Notices, Certifications, and Demonstrations:

If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)- ☒

(i) EPA HW ID number? ☒

(ii) Appropriate treatment standards and prohibitions? ☒

(iii) Manifest number for the waste? ☒

(iv) Available waste analysis data? ☒

Land Disposal Restrictions:- Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the waste is determined to be <u>restricted but not required further treatment</u> , has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Did the notification include: 268.7(a)(2)(i)-			
(a) EPA HW ID number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(b) Appropriate treatment standards and prohibitions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(c) Manifest number for the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(d) Available waste analysis data?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Was the following certification signed: 268.7(a)(2)(ii)-			
I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.			
If the generator's waste is <u>subject to a national variance, an extension or an exemption</u> , have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Did the notice include: 268.7(a)(3)-			
(i) EPA HW ID number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(ii) Appropriate treatment standards and prohibitions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(iii) Manifest number for the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(iv) Available waste analysis data?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(v) The date the waste is subject to prohibitions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

NOTE: If the recipient of the generator's waste is not on the attached list (p. 12) of known land ban facilities, or if an off-site shipment without notification has occurred, indicate the accepting TSD facility on p. 12 for proper follow-up.

Land Disposal Restrictions:- Continued  
(Part 268)

Yes   No   Comments

If determined that the waste is a First Third or Second Third waste without treatment standards and not a CA list waste (and thus a "soft hammer" waste), have they notified the receiving facility with each shipment? including: 268.7(a)(4)-

- |   |       |       |     |
|---|-------|-------|-----|
| (i) EPA HW ID number?   | _____ | _____ | N/A |
| (ii) Appropriate certifications and the restrictions under 268.33(f) for "soft hammer" waste? | _____ | _____ | N/A |
| (iii) Manifest number for the waste?  | _____ | _____ | N/A |
| (iv) Available waste analysis data?   | _____ | _____ | N/A |

If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)

Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)

Generators of First Third and Second Third "soft hammer" wastes (268.33(f)) shipped for land disposal:

Prior to shipment for land disposal, has the generator certified and submitted to the RA a demonstration of a good faith effort to locate and contract with treatment and recovery facilities for the practically available treatment which provides the greatest environmental benefit? 268.8(a)(1-2)

Did the demonstration include a list of facilities and representatives contacted, complete with addresses, phone numbers, and contact dates? 268.8(a)(2)

Land Disposal Restrictions:- Continued  
(Part 268)

Yes   No   Comments

Was a copy of the demonstration submitted to the receiving facility with the first shipment of waste?

268.8(a)(3) or -(4)

✓

Was a copy of the certification submitted with each shipment of waste?

268.8(a)(3) or -(4)

✓

Are copies of the demonstration and certification kept on-site for at least five years? 268.8(a)(3) or -(4)

✓

If the generator determined there is no practical treatment for his waste, did the demonstration include a written discussion and the following certification? 268.8(a)(2)(i)

✓

~~RA~~

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

If the generator determines that there are practical treatments for the waste, did they contract to use the technology that they demonstrated yields the greatest environmental benefits?

268.8(a)(2)(ii)

✓

~~RA~~

Did they include the following certification? 268.8(a)(2)(ii)

✓

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or otherwise provide treatment) by the practically available technology that yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

Has the generator immediately notified the RA of any changes in the conditions on which the certification was based?

268.8(b)(1)

✓

Land Disposal Restrictions:- Continued  
(Part 268)

Yes    No    Comments

If the RA invalidated a certification, has the generator immediately ceased shipments of wastes, informed all facilities that received the waste, and retain records of the communication on-site in their files? 268.8(b)(3) ✓

Treatment Facilities: Waste Analysis

Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)

✓ uses generator's Knowledge

Were the non-wastewater form of the following HWs listed in 268.10, 268.11, & 268.12, incinerated in accordance with the requirements of Part 264 Subpart O, or burned in industrial furnaces or boilers in accordance with applicable regulatory standards: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(3) ✓

Were the wastewater form of the following HWs listed in 268.10, 268.11, & 268.12, treated by carbon adsorption or incineration, or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(4) ✓

Where the treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards? 268.7(b)(1) ✓

(Part 268)

Yes

No

### Comments

Test, pH test, HOCs, and PCB tests performed? -268.7(b)(2)

✓ Use generator's knowledge

For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested?  
268.7(b)(3)

✓ Use generator's Knowledge

Notifications and certifications:

Has the treater submitted with each shipment to the land disposal facility, a notice including: 268.7(b)(4)

(i) EPA HW ID number?

N/A

(ii) Appropriate treatment standards and prohibitions?

(iii) Manifest number for the waste?

(iv) Available waste analysis data?

Has the treatment facility submitted a signed certification with each shipment of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)

For wastes with treatment standards listed as concentrations (268.41 or -.43) did the certification read:  
268.7(b)(5)(i)

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.



Land Disposal Restrictions:- Continued  
(Part 268)

Yes   No   Comments

For wastes with treatment standards listed as technologies (268.42) did the certification read:  
268.7(b)(5)(ii) ✓

I certify under penalty of law that waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Treatment and Off-Site Storage facilities:

Where waste or treatment residues are sent off-site for further management, did the sender comply with the notification and certification requirements as the generator of the waste?  
268.7(b)(6-7) ✓

Where First Third and Second Third "soft hammer" wastes are treated or stored, has a copy of the generator's valid certification and demonstration been retained? 268.8(c)(2) and: ✓

Has the treater or storer forwarded copies of the generator's certification and demonstration (if applicable) to the facility receiving the waste or treatment residues? 268.8(c)(2) and: ✓

Has the treatment or recovery facility certified as follows with each shipment of waste that he has treated the waste in accordance with the generator's demonstration? 268.8(c)(1) ✓

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Land Disposal Restrictions:- Continued  
(Part 268)

Yes    No    Comments

Treatment in surface impoundments exemption:

If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility met the following conditions: 268.4(a)

N/A

(1) Treated, not just stored, the wastes in the impoundment?

(2)(i) Analyzed all treatment residues (sludge and supernatant separately) to determine if they meet treatment and/or prohibition standards?

N/A

(2)(ii) Removed, annually, all treatment residues (including liquids) that do not meet treatment or prohibition standards?\*

N/A

(2)(iii) Not placed the residues in another impoundment for subsequent management?\*

N/A

Has the facility certified that all impoundments used to treat restricted wastes meet design requirements (265.221(a))? 268.4(a)(3-4)

N/A

Has the facility certified that it is in compliance with GW monitoring (265 Subpart F) requirements? 268.4(a)(3-4)

N/A

Is there a principal means of treatment other than evaporation of HW constituents? 268.4(b)

N/A

\* Unless the wastes have a valid "good faith" certification under 268.8. If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed.

Land Disposal Restrictions:- Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the waste analysis plan include the procedures and schedule for: 268.4(a)(2)(iv); 265.13(b)(7)-			
(i) Sampling the impoundment contents?			N/A
(ii) The analysis of test data?			N/A
(iii) The annual removal of residues which exhibit a HW characteristic?			N/A
and: (A) Fail 268 Subpart D treatment standards? or:			N/A
(B) Where no treatment standards have been established, such residues are prohibited from land disposal under:			N/A
(1) 268.32 (CA list) or RCRA 3004(d)?			N/A
(2) 268.33(f)(1st 3rd & 2nd 3rd)?			N/A

Land Disposal Facilities:

Does the facility have copies of all notices, certifications, and applicable demonstrations? 268.7(c)(1) (See also 265.73, Operating Record)			N/A
---	--	--	-----

Has the facility tested the waste, or an extract of the waste or treatment residue (using the TCLP, 268 Appendix I) to assure that the wastes or residues are in compliance with land disposal restrictions? 268.7(c)(2)			N/A
---	--	--	-----

Was the testing performed according to the frequency specified in the waste analysis plan? 268.7(c)(2)			N/A
--	--	--	-----

Where First Third or Second Third "soft hammer" (268.33(f)) or CA waste liquid (268.32) wastes are disposed, did the facility:  
268.7(c)(3), 268.8(d)

Ensure the required certification (268.8) was received prior to disposal? and:			N/A
--	--	--	-----

That the disposal unit was in compliance with the "minimum technology" requirements of 40 CFR? 268.5(h)(2)			NA
--	--	--	----

Land Disposal Restrictions:- Continued  
(Part 268)

Identified TSFs that treat LDR Waste:

AZD049318009	Buds Oil Service
AZD980816102	Environmental Waste Entpr
AZT050010230	Esco
AZD089308803	Safety Kleen
AZD980802897	Safety Kleen
AZD009015389	Southwest Solvents
AZD049314370	Rinchem Co. Inc.
CAD074644659	Baron Blakeslee
CAT000618652	Baron Blakeslee
CAT080014079	Bay Area Environmental
CAD028409019	Crosby & Overton
CAD000633115	IT Corp., San Jose Transfer
CAD008302903	Oil & Solvent Processing
CAD042245001	Omega Chemical
CAD029363876	Orange County Chemical Co.
CAT080012651	Orange County Chemical Co.
CAD095894556	Pacific Treatment Company
CAD008364432	Rho-Chem
CAD980737548	Roehl Corporation
CAD009452657	Romic Chemical
CAD066113465	Safety Kleen
CAD077187888	Safety Kleen
CAD093459485	Safety Kleen
CAD980894562	Safety Kleen
CAT000613935	Safety Kleen
CAT000613919	Safety Kleen
CAD066177783	Safety Kleen
CAT000613893	Safety Kleen
CAT000613976	Safety Kleen
CAT000613992	Safety Kleen
CAT000613950	Safety Kleen
CAT000613927	Safety Kleen
CAD080916968	Safety Kleen
CAD980892475	Safety Kleen
CAT000613984	Safety Kleen
CAD053044053	Safety Kleen
CAD980817159	Safety Kleen
CAT000613943	Safety Kleen
CAT000613968	Safety Kleen
CAD059494310	Solvent Services
CAT080033681	Chem Tech Inc. (formerly Triple J Pacification)
NVD980895338	Eticam

ID#

Name/Address

Accepted w/o  
Certification?



# FINANCIAL RESPONSIBILITY REVIEW

TO: Pat Payne SEU Smua Low FPU REGION 1, ② 3, 4  
 FROM: Frank Lee FRU PHONE 8-485-0640

For the purpose of the financial responsibility review, the results of the evaluation are good for sixty (60) days from the date of this review and are as follows:

FACILITY Bay Area Environmental ADDRESS California Advanced Environmental Tech. 1125 Hensley St, Richmond Ca EPA ID# CAT080014079

## I. FACILITY TYPE

MAJOR \_\_\_\_\_ NON-MAJOR X RCRA X NON-RCRA \_\_\_\_\_  
 TREATMENT \_\_\_\_\_ STORAGE X DISPOSAL \_\_\_\_\_ OTHER \_\_\_\_\_  
 INTERIM \_\_\_\_\_ PERMITTED X PBR \_\_\_\_\_ TTU \_\_\_\_\_

## II. FINANCIAL ASSURANCE FOR CLOSURE/POST-CLOSURE

TYPE OF DOCUMENT: Letter of credit  
 COST ESTIMATES: CLOSURE \$ 33,000 POST-CLOSURE \$ \_\_\_\_\_  
 DEFICIENCY: CLOSURE \$ \_\_\_\_\_ POST-CLOSURE \$ \_\_\_\_\_  
 RESULTS: PASS X FAIL \_\_\_\_\_ (SEE COMMENTS)

## III. LIABILITY COVERAGE

TYPE OF DOCUMENT: Certificate of Insurance  
 DOLLAR AMOUNTS: SUDDEN \$ 1 million / 2 million NON-SUDDEN \$ \_\_\_\_\_ / \_\_\_\_\_  
 (PER OCCURRENCE) (AGGREGATE) (PER OCCURRENCE) (AGGREGATE)  
 RESULTS: PASS X FAIL \_\_\_\_\_ (SEE COMMENTS)

## IV. ENFORCEMENT ACTION

DATE STATUS

1. REPORT OF VIOLATIONS ISSUANCE: \_\_\_\_\_
2. CORRECTIVE ACTION ORDER: \_\_\_\_\_
3. ANTICIPATED ACTION: \_\_\_\_\_
4. OTHER REFERRALS: \_\_\_\_\_

COMMENTS: Transfer of ownership from Bay Area Environmental to California Advanced Environmental Technology. New owner/operator is in compliance.

Frank Lee 1/3/91 Nancy J. Kelly 1/8/91 1/3/91  
 FRU ANALYST DATE FRU CHIEF DATE CMEI DATE

FIRST COPY - SEU

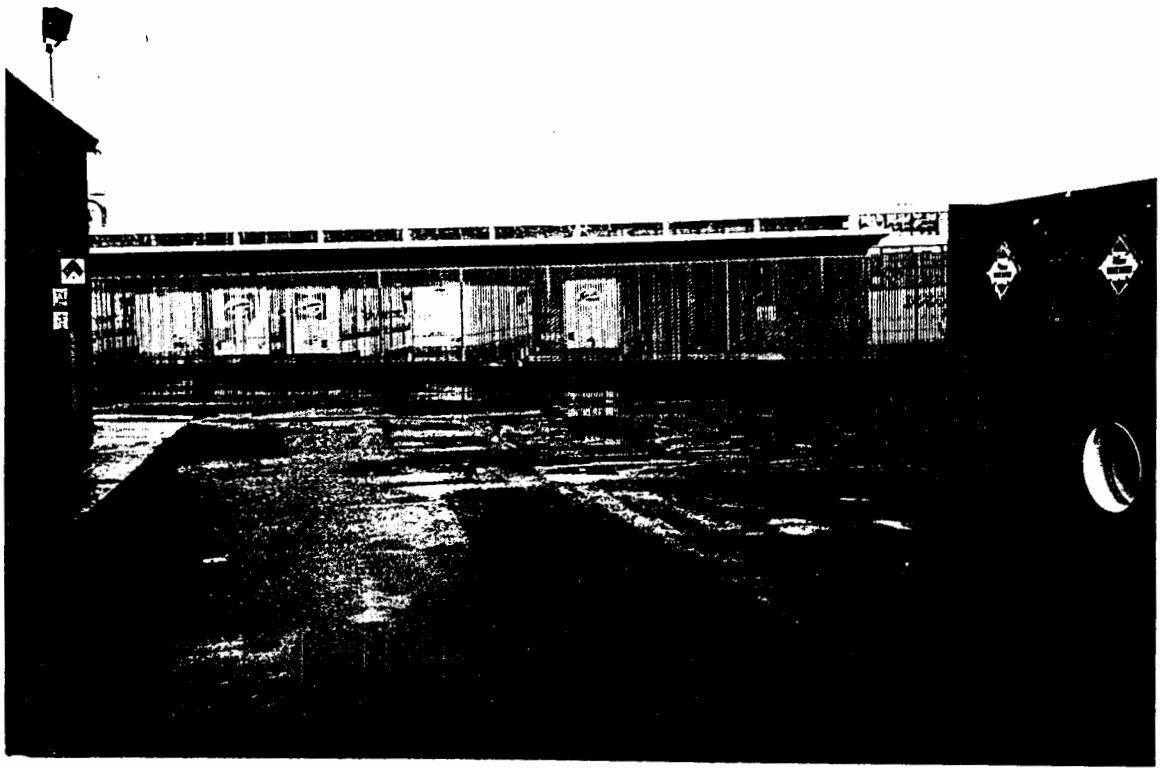
SECOND COPY - FPU

THIRD COPY - FRU

STATE OF CALIFORNIA - DEPARTMENT OF HEALTH SERVICES

ATTACHMENT O





No. 1. New rear ten foot fence with redwood slates has been installed in the hazardous waste storage area. Paved area has recently been resurfaced. Looking northwest.

No. 2. Acid Bay. Note DOT 21C-1-15, fiber pack containers labeled corrosive, 5.28 cf capacity with tracking number (eg. CA01061#10) and site disposal number (eg. ST-0075). Looking west.



CAETC  
1125 Hensley Street  
Richmond, CA 94801  
CAT 080014079  
February 28, 1991  
Photographer: B. C. Griffith





No. 3. Acid Bay. Note DOT one gallon fiber and wood containers (left) and DOT 1.89 cf fiber containers (right), which are used by CAETC for lab packing at their customers site. Note standing water due to recent rain.

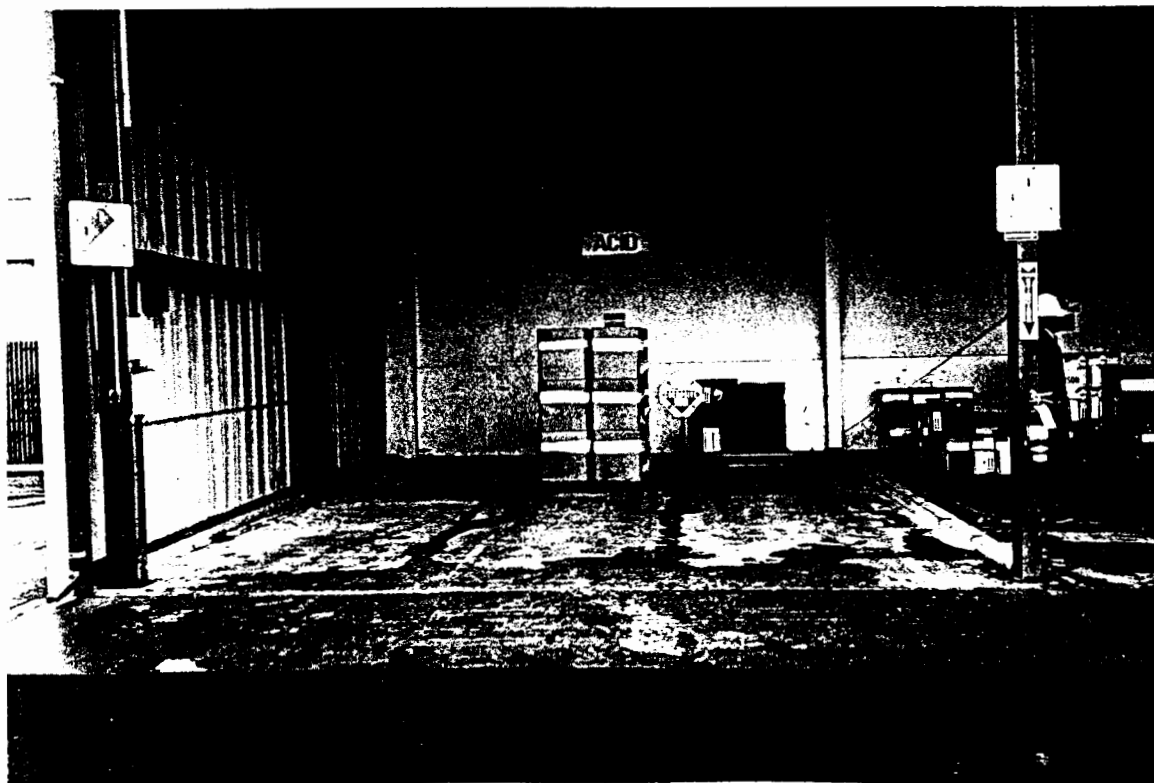
No. 4. Acid Bay. Note one 55-gallon, blue polyethylene drum and one 17 H 55-gallon drum on wooden pallet. Standing water in acid bay result of recent rain. Containers were not in water. See photo No. 3 for orientation. Looking south.



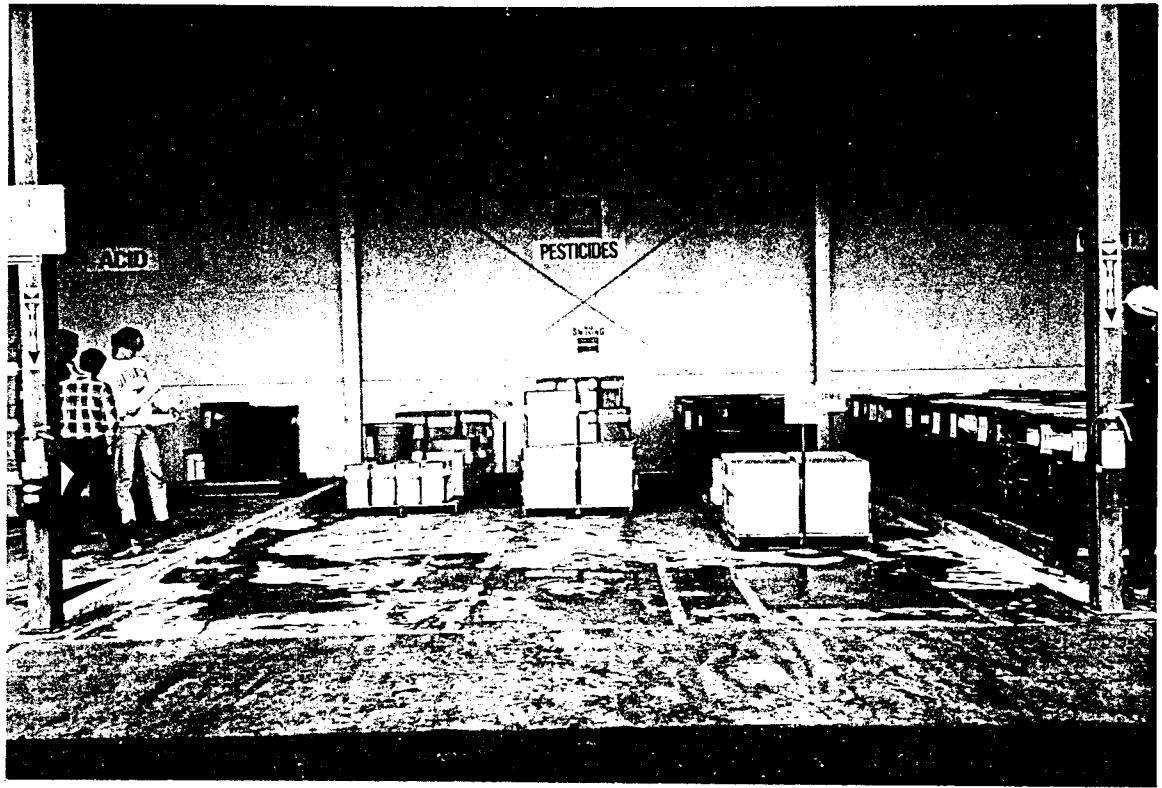
CAETC  
1125 Hensley Street  
Richmond, CA 94801  
CAT 080014079  
February 28, 1991  
Photographer: B. C. Griffith



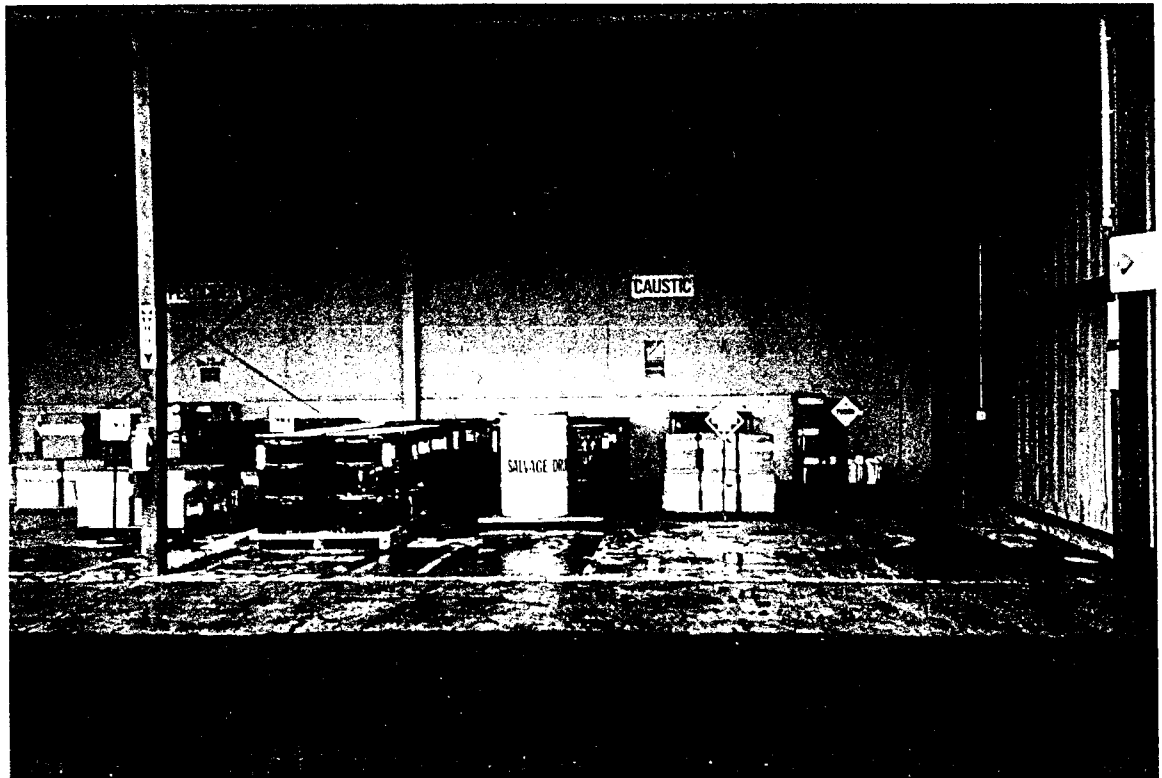
No. 5. Acid Bay. See Photos No. 3 and 4 for orientation. Close-up of lid of blue 55-gallon polyethylene showing tracking numbers for drum.



No. 6. Acid Bay. Overview of acid bay. Note fire extinguisher to the right. Posted to the left is the emergency evacuation route. Looking southwest.

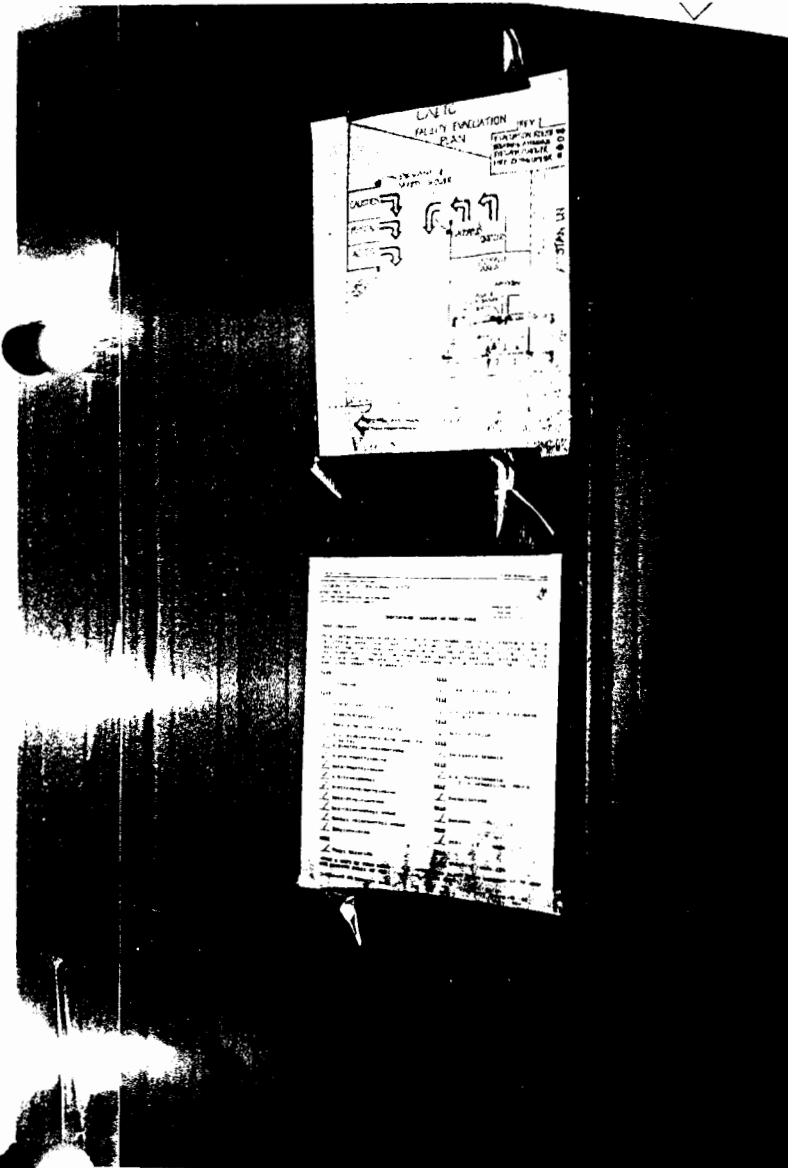


No. 7. Pesticide Bay. Overview. Note that Poisons are separated from ORM-E and ORM-A wastes.



No. 8. Caustic Bay. Overview. Note the black 55-gallon drums on the left contain drilling mud and contaminated mud from spill clean-ups. Posted to the right is the emergency evacuation plan (top) and the carcinogen "report of use" form (bottom) (See Photo No. 10).

No. 9. Mr. Madoshi verifying that the eyewash shower adjacent to the Caustic Bay was in working order. Looking south.



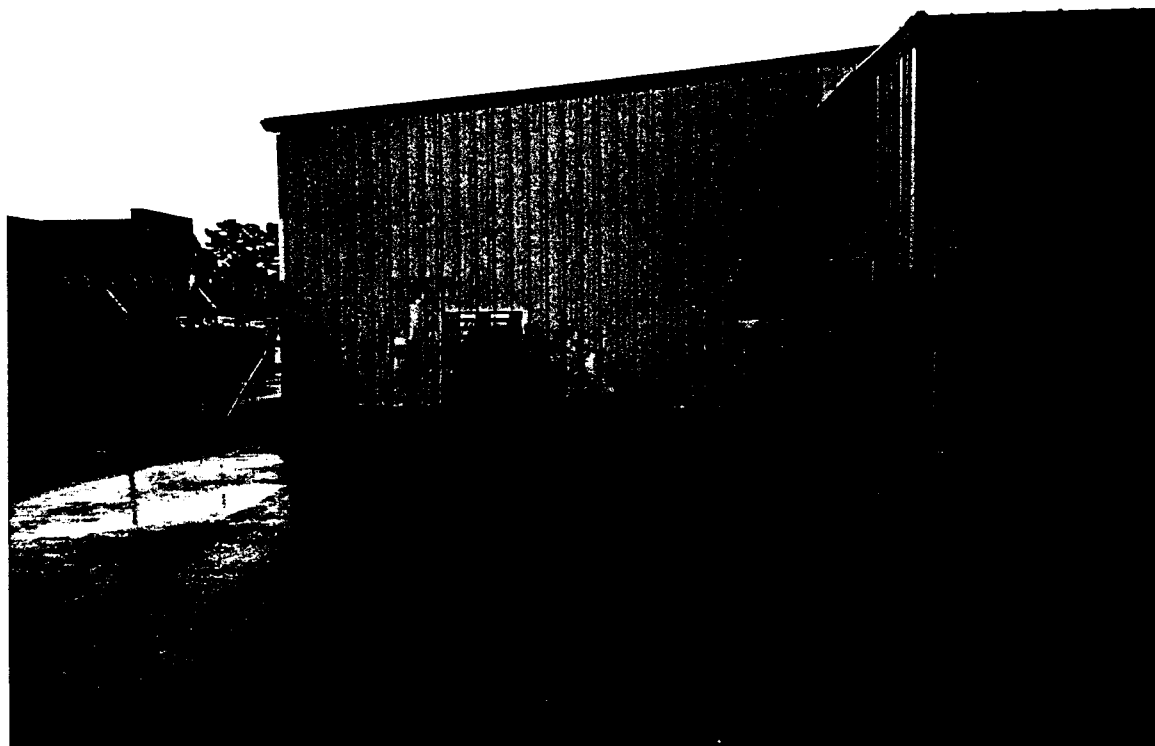
No. 10. Emergency evacuation plan (top) and carcinogen "report of use" form posted at the northwest end of the Caustic Bay. See Photo No. 8 for orientation.

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Richmond, CA 94801

CAT 080014079  
February 28, 1991  
Photographer: B. C. Griffith



No. 11. Southwest corner of hazardous waste storage area. Note new rear ten foot high fence with redwood slates and newly resurfaced area.



No. 12. Newly resurfaced area adjacent to the oxidizer bay. Looking southeast.

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1125 Hensley Street  
Richmond, CA 94801

CAT 080014079  
February 28, 1990  
Photographer: B. C. Griffith



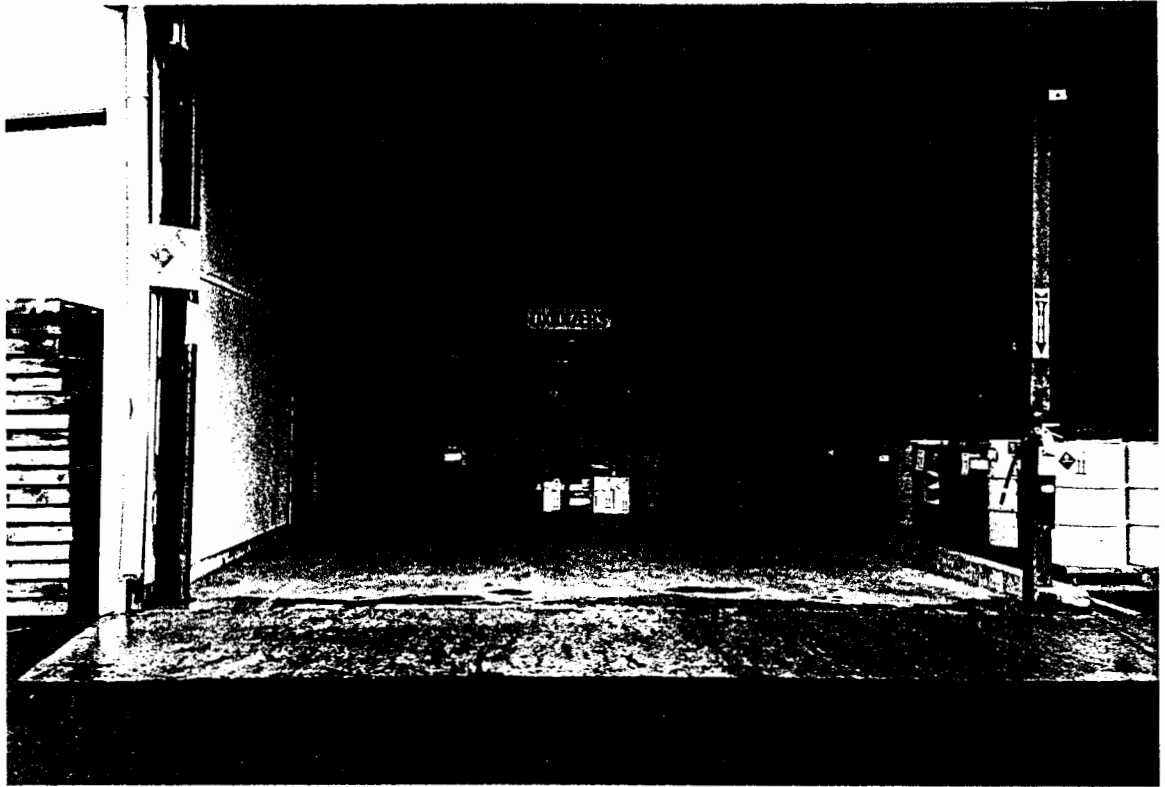
No. 13. Note a 3M Oil Sorbent Boom is being used by CAETC to keep runoff from entering the former valve box, which drains directly to the street by a culvert.



No. 14. Close-up of the 3M Oil Sorbent Boom as seen in Photo No 13. Note opening for valve, which has been capped by CAETC.

CAETC  
1125 Hensley Street  
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CAT 080014079  
February 28, 1990  
Photographer: B. C. Griffith



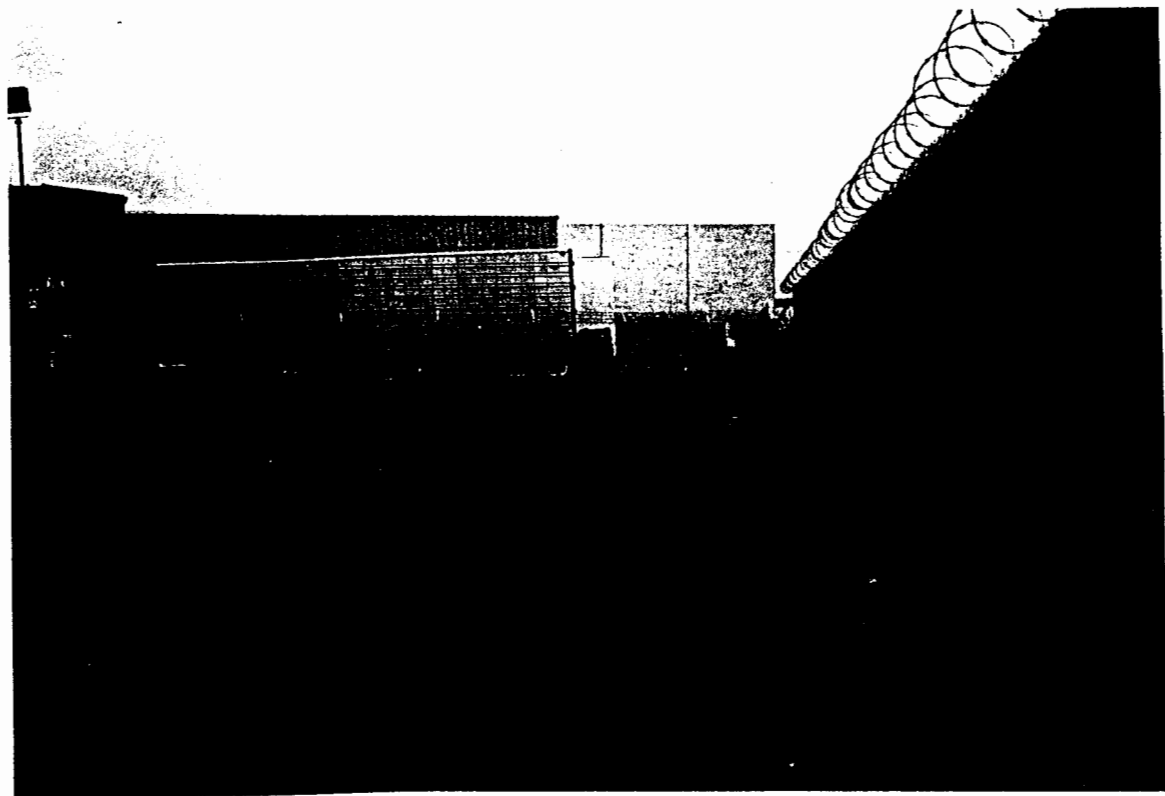
No. 15. Oxidizer Bay. Overview. Looking southeast.



No. 16. Flammable Bay. Note 11 55-gallon drums of combustible waste are stored in the rear of the flammable bay. Flammables were ten feet from rear of flammable bay per CAL OSHA requirements. Looking south.



No. 17. Overview of the acid, pesticide and caustic bays. Note standing water from recent rain. Looking southwest.

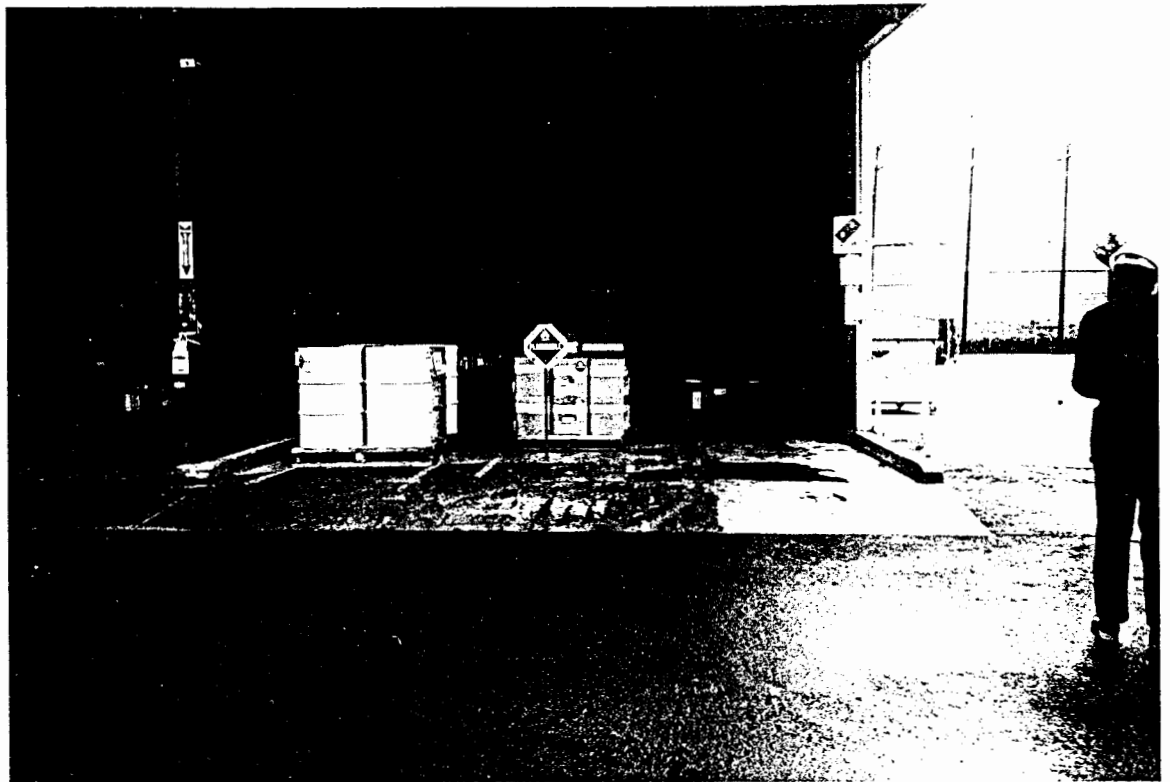


No. 18. Looking southwest along the new rear fence line of the hazardous waste storage area.

CAETC  
1125 Hensley Street  
Richmond, CA 94802

CAT 080014079  
February 28, 1991  
Photographer: B. C. Griffith





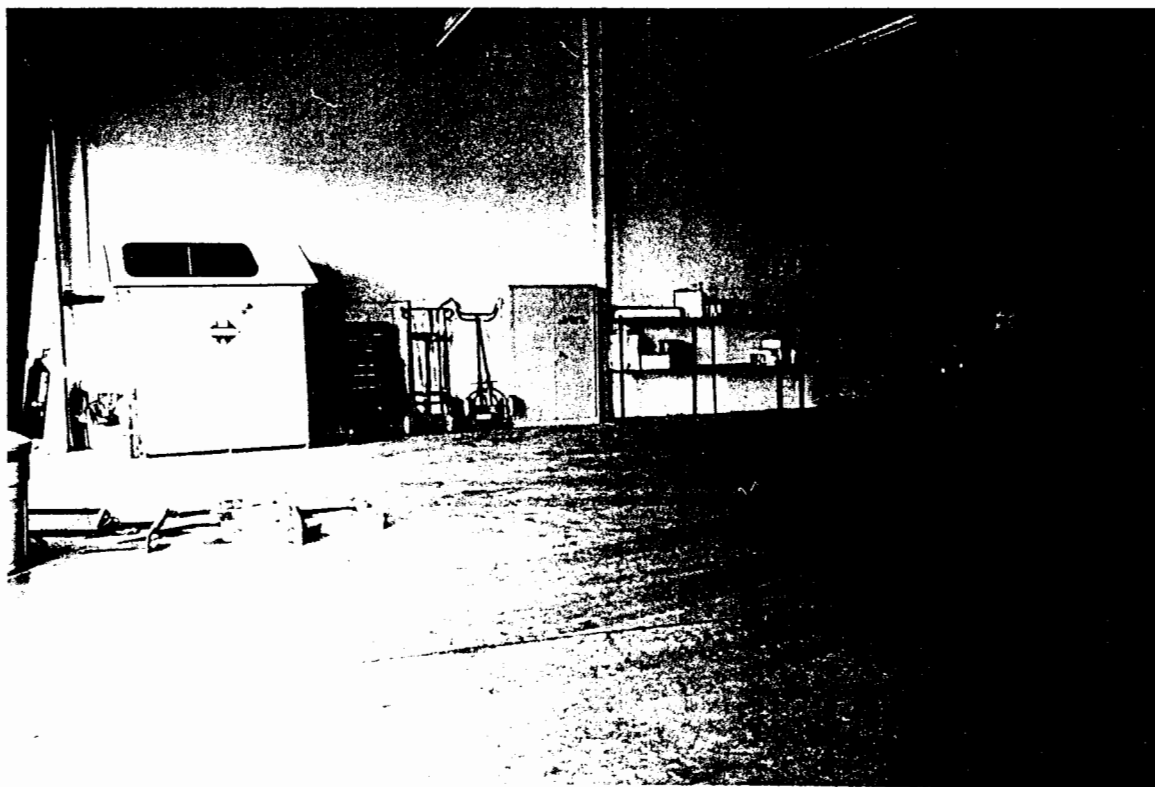
No. 19. Flammable Bay. Looking southeast into the flammable bay. Emergency evacuation plan and carcinogen "report of use" form were posted at the south end of the bay.



No. 20. Flammable Bay. Looking northeast into the flammable bay. Note the yellow sign to the left of the eyewash shower: "cancer-suspect authorized personnel only". This sign is posted in all of the hazardous waste storage bays.



No. 21. Warehouse. Interior is used to store supplies eg. drums, overpacks sorbent materials (background). Looking north.



No. 22. Warehouse. Northwest wall of warehouse. White flammable store container used for storage of flammable products. Looking northwest.



No. 23. Warehouse. Air cylinders to fill SCBA's are located on southeast wall of the warehouse. Looking northeast.

CAETC  
1125 Hensley Street  
Richmond, CA 94802

CAT 080014079  
February 28, 1991  
Photographer: Bonnie C. Griffith



FDR-13  
Site CAETC  
Pine

**AETC**  
CALIFORNIA ADVANCED ENVIRONMENTAL  
TECHNOLOGY CORPORATION

HAYWARD COMMERCE CENTER, 19410 CABOT BOULEVARD, HAYWARD, CALIFORNIA 94545 415-782-7000

January 3, 1991

Mr. Salvatore Ciriello  
Senior Waste Management Engineer  
California Department of Health Services  
700 Marin Avenue, Building F  
Berkeley, California 94710

Dear Mr. Ciriello:

As you are aware, California Advanced Environmental  
Technology Corporation (CAETC) has purchased the Bay Area  
Environmental (BAE) facility located in Richmond, California.

CAETC is currently operating this facility in accordance  
with a hazardous waste facility permit issued by the California  
Department of Health Services (CADHS) dated October 31, 1990.  
Attached please find two (2) copies of the Part B Application for  
the proposed operations and modifications to the facility.

If you have any questions, please do not hesitate to contact  
me at (201) 691-3910.

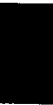
Sincerely,

*James Bell*  
James T. Bell  
Vice President  
Regulatory & Technical  
Affairs

JTB/pa

Attachment

ATTACHMENT Q



Date: 1/22/90Time: 9:00 AMTo: DAVID TAOFrom: B. J. T. T. T. T.RECORD OF  
COMMUNICATION☐ Discussion☐ Field Trip☐ Meeting☒ Phone Call☐ Other

Subject:

HAZ WASTE PERMIT UPDATE

SUMMARY: Status of currently HAZ waste permits -

Until ~~then~~ amendments are made to the EHP held by the generator, they cannot accept EHW listed in their permits.

The generator needs to amend the EHP and Permitting will date & sign the EHP and send this copy to the generator - there will be no additional charge for the amendments. Amendments are not ~~being~~ logged in the permit EHP issued is BAE and void as a matter of policy. CAETC has to apply for its own EHP permits.

reconfirmed CAETC has been informed of this information

DBS 9:25 AM  
W.D. TAO

Firm: DAVIS/SCIP/200, in FPS

Address: \_\_\_\_\_

Tel. No. 540-3934☐ Conclusions☐ Actions taken☐ Actions to be taken

Informational copies:

Pat Panner  
File





ATTACHMENT 6

Businesses Within One Quarter Mile  
of the CAETC Richmond Facility

CAETC Neighbors

- o Dana Fuller Company  
1111 Hensley Street  
Richmond, CA 94801

Mailing address:  
P.O. Box 282  
Pt. Richmond, CA 94807

Contact: Dana Fuller  
Phone: (415) 620-0330

- o Sealy Mattress Company  
1130 7th Street  
Richmond, CA 94801

Contact: Townsend Brady, Marketing Manager  
John Doberneck, Plant Manager  
Phone: (415) 235-7171

- o San Francisco Newspaper Agency  
909 Montgomery Street, Suite 500  
San Francisco, CA 94133

Contact: Richard E. Winnie, Attorney  
Phone: (415) 397-7710  
Fax: (415) 956-1299

- o West County Toxic Coalition  
1019 MacDonald Avenue  
Richmond, CA 94801

Contact: Henry Clark  
Phone: (415) 232-3427

- o West County Toxic Coalition  
West County Conservation League  
League of Women Voters  
1015 Leneve Place  
El Cerrito, CA 94530

Contact: Jean Siri  
Phone: (415) 524-3476



Date: 1/18/91Time: 3:45 PMTo: Patricia BrowittFrom: Bonnie GriffithRECORD OF  
COMMUNICATION☐ Discussion☐ Field Trip☐ Meeting☒ Phone Call☐ Other

Subject:

HAULER Reg. #

## SUMMARY:

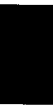
I call Ms Browitt to confirm the Hauler Registration number for CATEC. CATEC hauler registration number is 2848. It was issued August 2, 1990 and expires August 2, 1991. HQ computer shows 1 vehicle.

Appropriate coverage would be \$1.2M.

Firm: DHS / TSCP - HAULERAddress: 400 P' SactoTel. No. (916) 324-2430☐ Conclusions☐ Actions taken☐ Actions to be taken

ATTACHMENT T

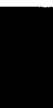
Informational copies:



STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL  
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC  
SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL  
PROTECTION AGENCY OR THE CALIFORNIA DEPARTMENT  
OF HEALTH SERVICES.

PHYSICAL STATE:  
☐ SOLID ☐ LIQUID

HAZARDOUS PROPERTIES: ☐ FLAMMABLE  
☐ TOXIC ☐ CORROSIVE  
☐ REACTIVITY ☐ OTHER \_\_\_\_\_



ATTACHMENT 5

Location of Facility

Emergency Equipment





# ADDC

CALIFORNIA ADVANCED ENVIRONMENTAL  
TECHNOLOGY CORPORATION

## EMERGENCY EQUIPMENT

## KEY

EYEWASH-SHOWER  
BREATHING APPARATUS-  
FIRST AID KIT  
ELECTRICAL SHUTOFF  
FIRE EXTINGUISHER  
FIRE ALARM PULL

EYE WASH &  
SAFETY SHOWER

CAUSTICS

POISONS

ACIDS

WIND  
SOCK

FLAMMABLES

OXIDIZERS

STORAGE  
AREA

ABSORBANTS

EYEWASH &  
SAFETY SHOWER  
(2ND FLOOR)

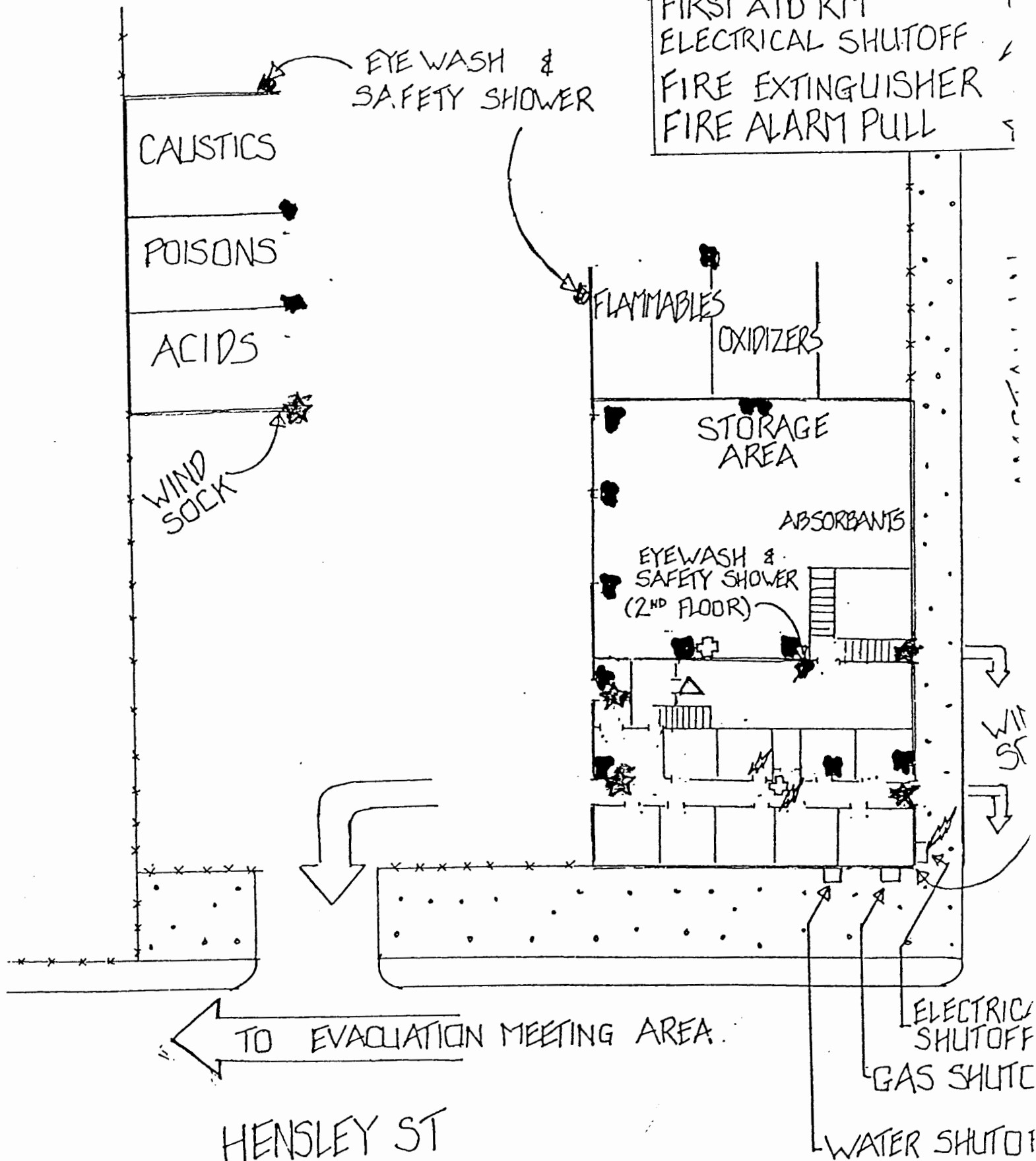
TO EVACUATION MEETING AREA

HENSLEY ST

ELECTRIC  
SHUTOFF

GAS SHUT

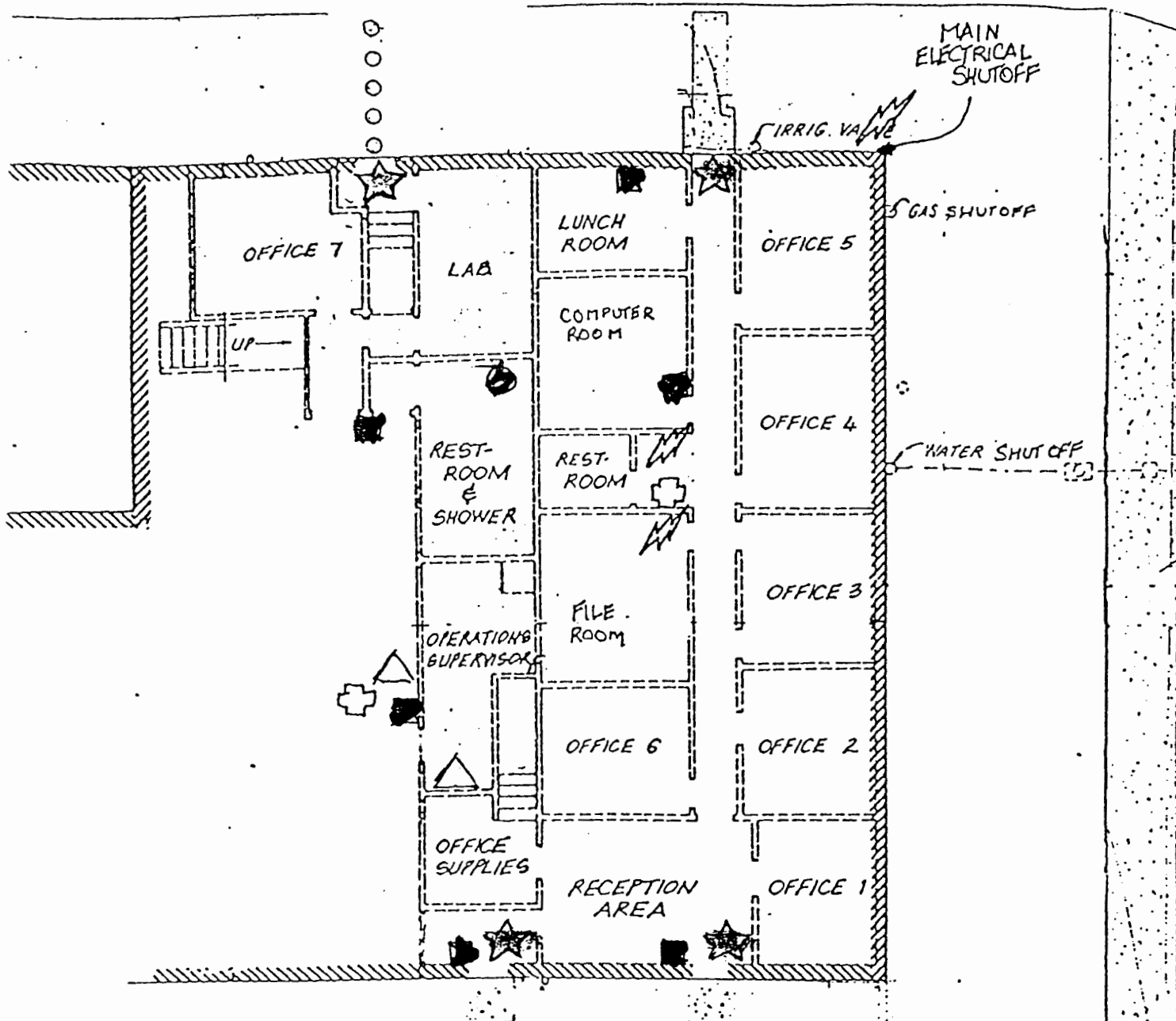
WATER SHUTOFF





CALIFORNIA ADVANCED ENVIRONMENTAL  
TECHNOLOGY CORPORATION

# EMERGENCY EQUIPMENT OFFICE FIRST FLOOR



## KEY

EYEWASH-SHOWER



BREATHING APPARATUS



FIRST AID KIT



ELECTRICAL SHUTOFF



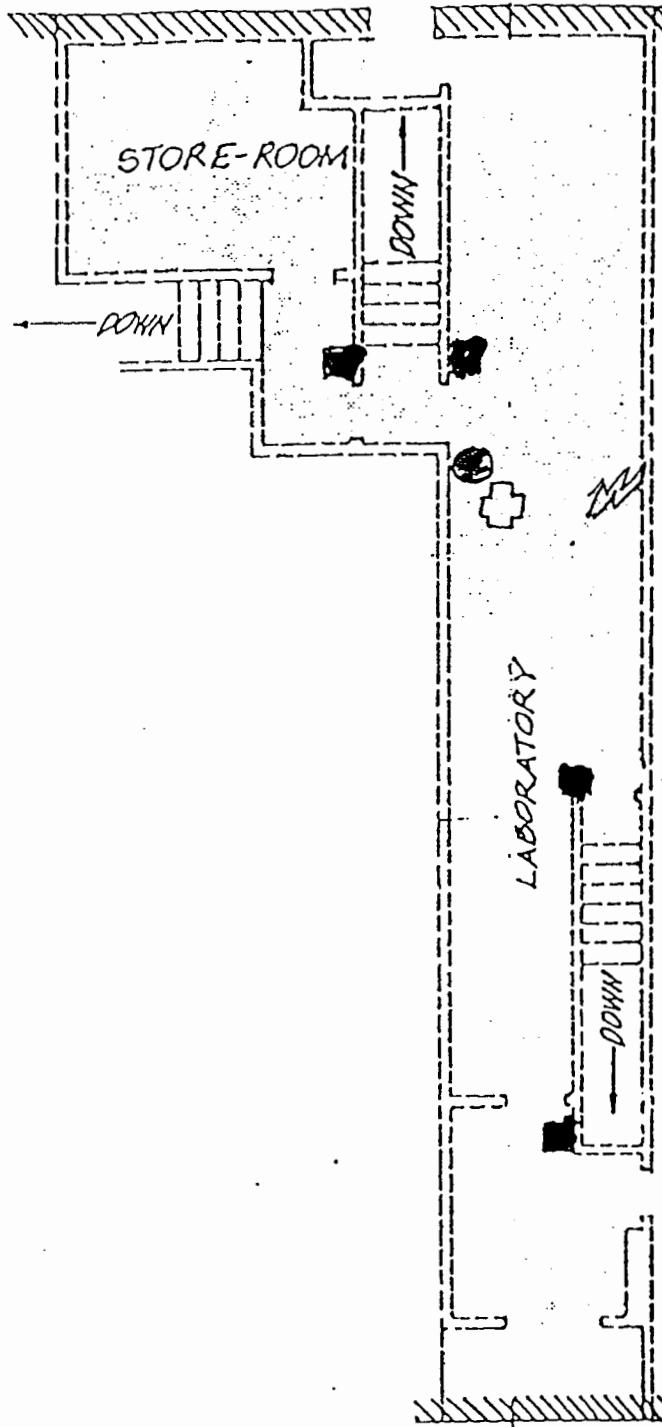
FIRE EXTINGUISHER









FIRE ALARM PULL



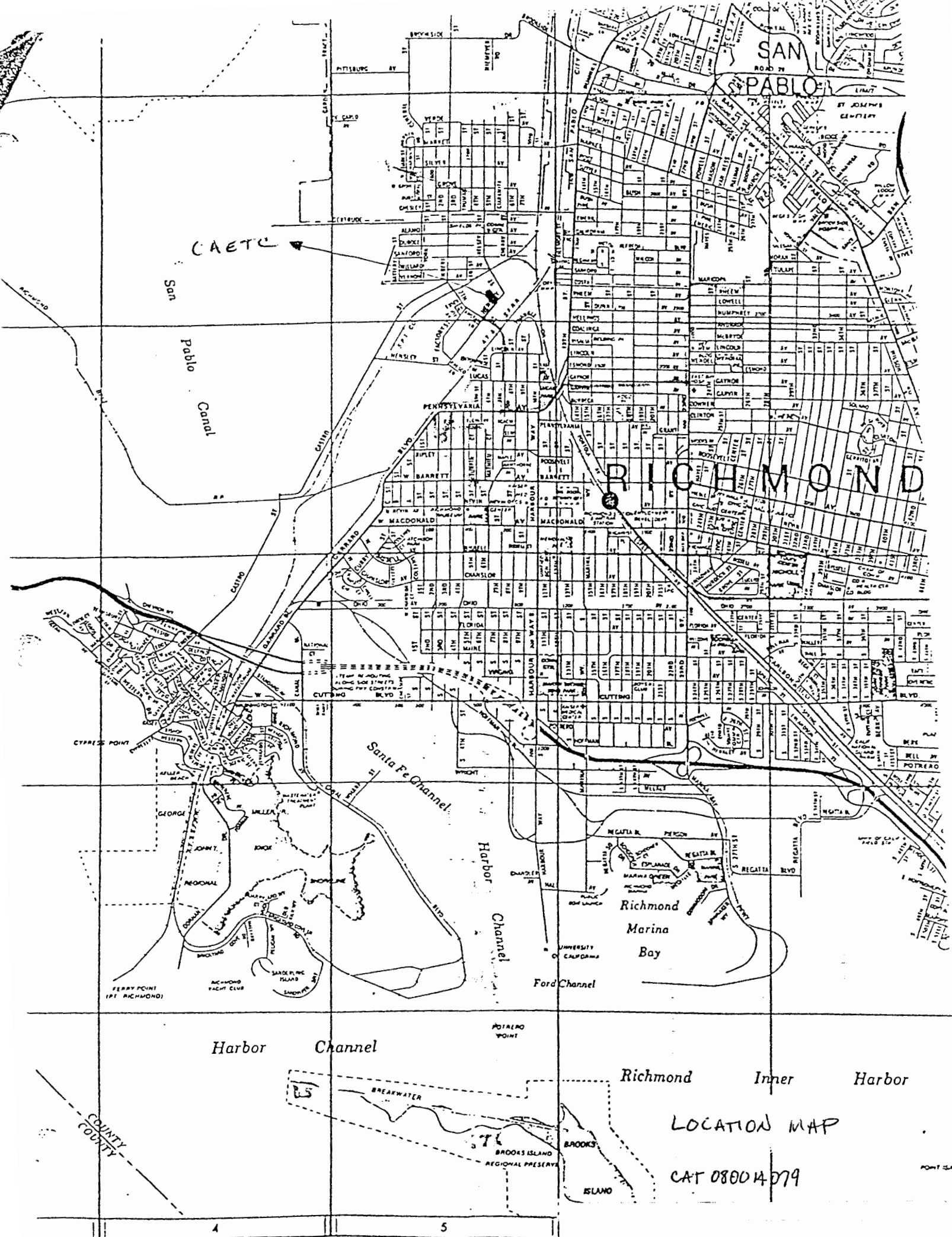
# LABORATORY - SECOND FLOOR



## EMERGENCY EQUIPMENT

KEY	
EYEWASH-SHOWER	
BREATHING APPARATUS	
FIRST AID KIT	
ELECTRICAL SHUTOFF	
FIRE EXTINGUISHER	
FIRE ALARM PULL	





CAETC

San  
Pablo  
Canal

Santa Fe Channel

Harbor  
Channel

Ford Channel

Richmond  
Marina  
Bay

Harbor Channel

Richmond Inner Harbor

LOCATION MAP

CAT 08004079

POINT SLAM



## B & N ENTERPRISES

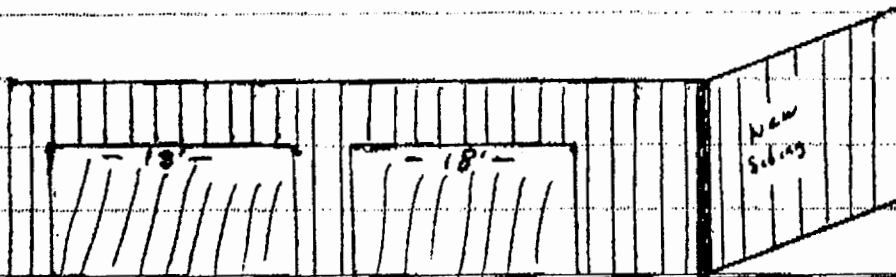
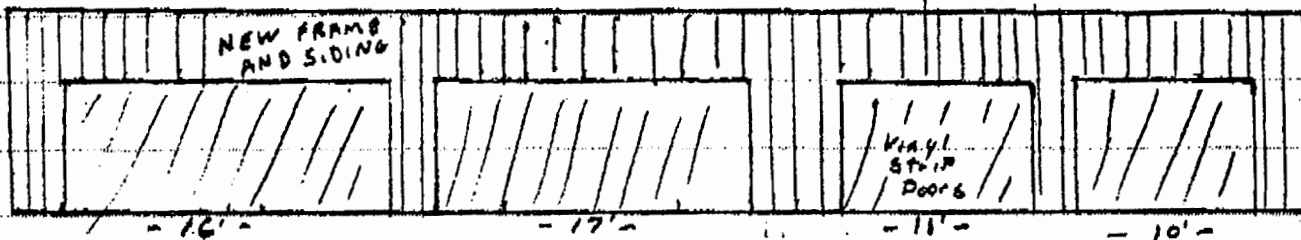
Post Office Box 4851  
WALNUT CREEK, CALIFORNIA 94596  
(415) 932-4551

PROPOSAL SUBMITTED TO <b>CAETC</b>		PHONE <b>233-8001</b>	DATE <b>1/30/91</b>
STREET <b>1125 Hensley Street</b>		JOB NAME <b>Same</b>	
CITY, STATE AND ZIP CODE <b>Richmond, CA 94801</b>		JOB LOCATION	
ARCHITECT <b>Thomas Oakley</b>	DATE OF PLANS	JOB PHONE	

We hereby submit specifications and estimates for:

B & N Enterprises will furnish all materials, tools, labor and equipment to complete the following:

1. Completely enclose flammable area structure and toxic structure area (two separate buildings). New building siding to match existing as close as possible.
2. Install six (6) sliding vinyl strip doors as per field measurements - all 13' high.
3. Paint by owner or add \$300.00 to price listed below.



**We Propose** hereby to furnish material and labor — complete in accordance with above specifications, for the sum of:  
Eight thousand five hundred and no/100----- dollars (\$ **8,500.00** ).

Payment to be made as follows:

**Progress payments**

ATTACHMENT X

All material is guaranteed to be as specified. All work to be completed in a workmanlike manner according to standard practices. Any alteration or deviation from above specifications involving extra costs will be executed only upon written orders, and will become an extra charge over and above the estimate. All agreements contingent upon strikes, accidents or delays beyond our control. Owner to carry fire, tornado and other necessary insurance. Workers are fully covered by Workmen's Compensation Insurance.

Authorized Signature

*Bill Hardesty*

Note: This proposal may be

withdrawn by us if not accepted within **ten (10)** days.

**Acceptance of Proposal** — The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above.

Date of Acceptance: \_\_\_\_\_

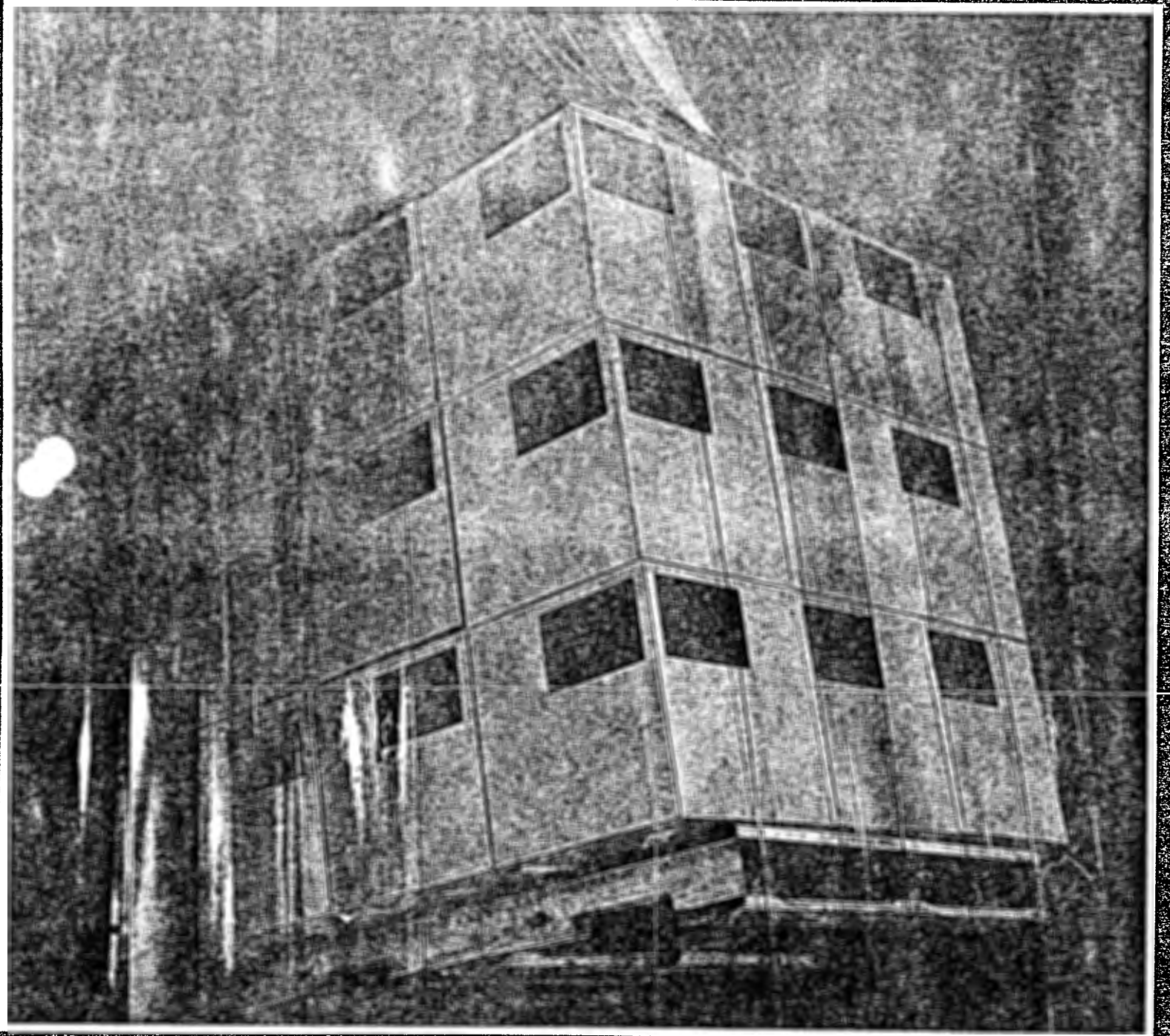
Signature

**X**

Signature



# **ECONO MAX STRIP DOORS**



**ECONO MAX MANUFACTURING, INC.**



# Specify Econo-Max Strip Door

## COMPLETE PRODUCT LINE AVAILABLE

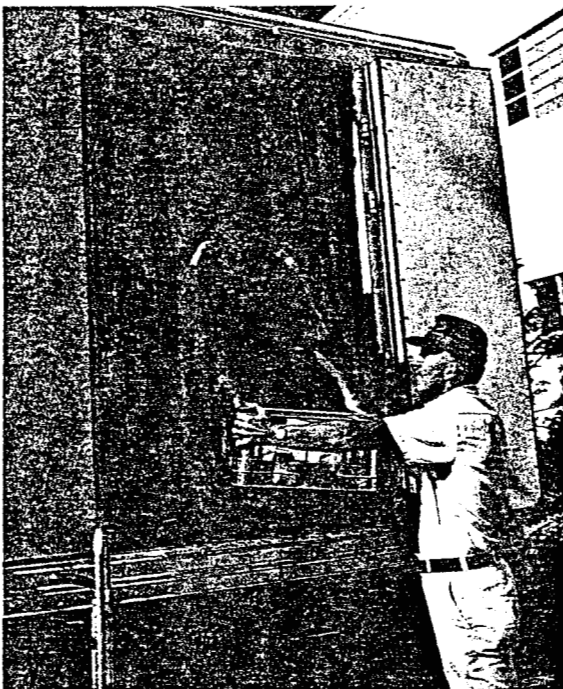
Ready to install strip doors, industrial barriers, roll goods or sheets, Econo Max Mfg. offers its materials in a variety of different widths, thickness, and formulations that are engineered to fit your company's needs.

## THE RIGHT PRODUCTS TO FIT YOUR APPLICATION

(As pictured from left to right.)

**STANDARD MATERIAL** comes in sizes from 4" wide .060 thick up to 48" wide and .160 thick.

**GOLD WELD SCREEN** material comes in sizes from 8" wide .080 up to 48" wide .080 thick. **SAFETY STRIP** material comes in sizes from 8" wide .080 thick up to 16" wide .160 thick. **LOW TEMPERATURE USDA** reinforced and unreinforced meets federal requirements for incidental contact with meat, poultry and dairy products and has an operating temperature range of +140°F/-40°F in sizes from 4" wide .060 thick up to 48" wide .160 thick.



### ECONO MAX STRIP DOORS FOR REFRIGERATED TRUCKS AND TRAILERS

Strip doors help prevent loss of refrigerated air and entry of warm air which can cut your cooling cost as much as 25%. They also allow maximum light inside the truck. Econo Max strip material is tough, resists moisture, heavy impacts and extreme temperatures. Strip material comes in 4", 6", & 8" widths and .060, .080 in thicknesses.



### WALK IN FREEZER AND COOLERS

Strip doors on freezers and coolers will drastically reduce the exchange of cold air from your walk-in with warmer more humid air when your cooler door is open. This decreases both compressor running time and defrost times. A strip door for this application is a real money saver that will last for years.



### WELD SCREEN

Our Gold Weld screen will protect workers against the effect of bright light. Supervisors can safely view through the screen when the door is open, even when it is not.

S

# unique mounting

## 50-80% STRONGER FOR EXTRA LONG LIFE!

We mount 100% of each strip to its individual hanger, eliminating the weak point and making our doors and barriers 50% to 80% stronger and one that will outlast other manufacturers by years.

### MOUNTING BAR THAT GOES UP IN RECORD TIME!

The aluminum mounting bar is attractive, well designed and professional in appearance, yet lightweight, strong and durable. Each individual strip easily clips into the aluminum mounting bar quickly with a minimum of nuts and bolts, then clamps the strip firmly between the front and rear sections, always insuring that each strip stays in its proper place.

### ECONO MAX DOORS SAVE ENERGY

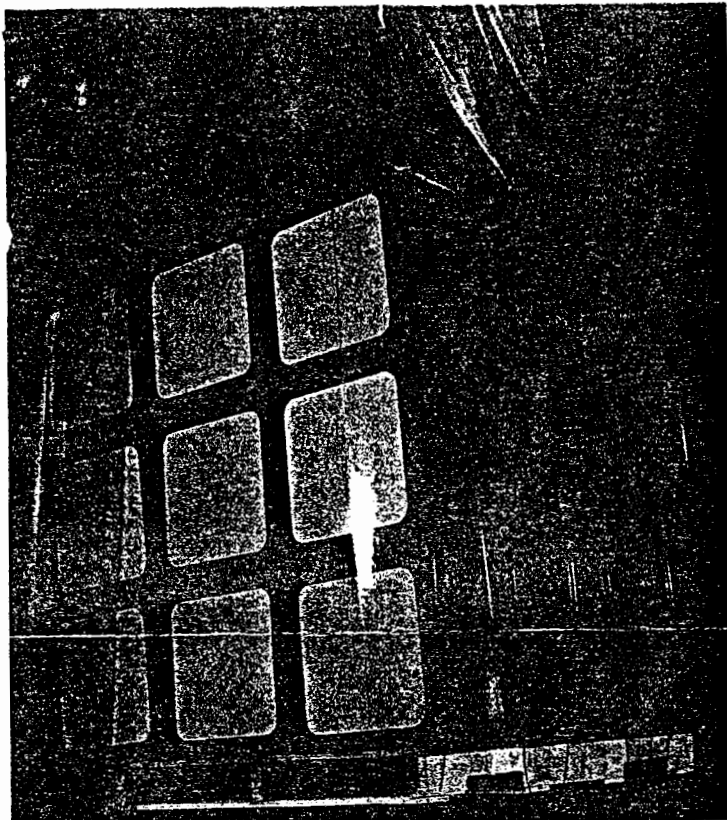
Econo Max vinyl strip and sheet material, secondary doors and barriers are among the most cost-effective, efficient and fieldproven methods available. Barriers from Econo Max reduce the loss of heated or cooled air through an otherwise open door.



Econo Max vinyl strips have a convex shape. This allows each strip to seal to the one next to it, ensuring a better seal.

**LOW COST • HIGH SAVINGS • FAST PAYBACK**

supervisors and  
et light welding.  
vel operation  
st. view the

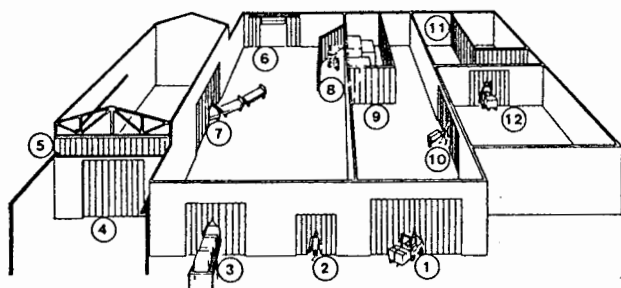


## THE CLEAR SOLUTION TO YOUR PROBLEMS

## ECONO MAX STRIP DOORS AND BARRIERS

### THERE IS A PLACE FOR ECONO MAX IN YOUR INDUSTRY

Strip doors and industrial barriers with Econo Max vinyl strip and sheet material can help save energy, improve worker comfort and safety and protect valuable products and equipment in virtually any industry. Proven by years of use, vinyl strip doors and barriers are found on walk-in freezers, loading doors, interior plant passageways and personnel doors, to name a few.



- |                                   |                                      |
|-----------------------------------|--------------------------------------|
| 1) Loading dock receiving door    | 8) Welding screens                   |
| 2) Personnel doors                | 9) Storage area enclosures           |
| 3) Conveyor openings              | 10) Temperature control rooms        |
| 4) Large exterior receiving doors | 11) Noise-reducing machine enclosure |
| 5) Craneway enclosures            | 12) Traffic door                     |
| 6) Combination with airstream     |                                      |
| 7) Partitions between rooms       |                                      |

#### WARRANTY

Econo Max warrants this product to be free of manufacturing defects and against product failure of any kind for a period of 12 months from date of shipment. This warranty is limited to the replacement of strips and/or attaching hardware, and does not include damage resulting from accident or malicious misuse. This warranty further applies only when recommended material, material thickness, and width are used for the originally specified application. Further it applies only to Econo Max doors which are properly installed in accordance with Econo Max installation instructions.

### FOR MORE INFORMATION

About Econo Max Strip Doors, contact your nearby dealer or Econo Max Mfg., Inc.

**WILLIAM P. LAWRENCE, INC.**  
23468 Rancho Ramon St.  
Tracy, CA 95376  
209/836-4876



Date: 3/7/91Time: AMTo: Lynne SeaperFrom: Donnie G. PlithRECORD OF  
COMMUNICATION☐ Discussion☐ Field Trip☐ Meeting☒ Phone Call☐ Other

Subject:

CAETC

SUMMARY: I returned Ms. Seaper ~~after~~ call of 3-4-91. She was inquiring about the result of the inspection report at CAETC on 2/28/91. I explained to her that there were a couple of areas I need to clarify to determine if they were violations and that overall the facility looked OK. - ~~But until the report is final~~ And when the report is approved I would like her know if there ~~was~~ were any violations. The other purpose of her call was to discuss her phone consultation with Jim Bell in regard to the valve at the NW end of the property - She said that Mr. Bell stated that CAETC did not have a contract w/ the City. The reason they closed the valve was that if water backed up near the berm, it would go to the street anyway. So CAETC felt it to remove the valve. File proposal for storm water - 1) Hook up pipe line - ① Containment, ② Collecting Tanks ③ Analysis ④ Discharge to Sewer - City of Richmond Planning wastewater Division - Could not discharge w/out permit, also covers storm drains, part of the permitting process (DHS) Valve control storm drainage - BAE Valve open straight to the street then to Bay.

CAETC neither option worked - CAETC not required (valve) since did not have a permit. City of Richmond had a contract w/ BAE. CAETC handled best way could w/ berm around valve. Lynne for Spills - ~~analysis~~ analysis, if spill, know with pickup - ~~patch~~ How

Firm:

City of Richmond / Public Works

Address:

Tel. No.

(415) 231-3060

☐ Conclusions☐ Actions taken☐ Actions to be taken

AYed considered a contact pt. Contacts w/ gutter system means that told her to talk to DAVID TAO. AS she had mentioned the valve, runoff was in the 11 submit DHS permit. -

Informational copies:

Date: 3/13/91Time: 9:05 AM: BONNIE GILBERT, DHSFrom: Lynn ~~Scarpone~~ ScarponRECORD OF  
COMMUNICATION☐ Discussion☐ Field Trip☐ Meeting☒ Phone Call☐ Other

Subject:

Blue Prints - CHETE

SUMMARY: Lynn left a message for me and provide the same information to David Tao (FEB) regarding Blueprints (1125 HENSLEY ST) storm water discharge. She said that her office had blue prints dealing with discharge of storm water to the ~~sewer~~ sewerage sewage plant. These plans did not include any drawings of piping to take the discharge to either a pit or tank or out to the POTW. She called Robert Lowell, CHETE ~~at her~~ at the Hayward office to make him aware of this problem. He said he would make me more detailed drawings for the City of Richmond. Lynn had called & let the Department know were their office was in their process.

Firm:

City of Richmond - Public

Address:

WORKS

Tel. No.

☐ Conclusions☐ Actions taken☐ Actions to be taken

Informational copies:

PAT  
PAT PAYNE



Date: 3/1/91  
 Time: 3:25 PM  
 To: MR. KASPER  
 From: Bennie G. Smith

RECORD OF  
COMMUNICATION

☐ Discussion ☐ Field Trip  
☐ Meeting ☒ Phone Call  
☐ Other

Subject:

Alterations / DOT CONTAINERS

SUMMARY: I called Mr. KASPER, PLANT MANAGER to CLARIFY SEVERAL QUESTIONS RESULTING FROM THE CEI INSPECTION CONDUCTED ON 2/25/91

- Mr. Kasper said that the Job Descriptions were on the shelf in his office in the REVERED FACT 3 THAT HAD BEEN SUBMITTED TO THE FPB.
- WEEKLY INSPECTIONS OF THE FACILITY BEGAN ON NOVEMBER 15, 1990 WHEN CAETC TOOK POSSESSION OF BAY 10 THE TRANSFER.
- Monthly Inspections began in JAN, 1991
- AS part of the ~~CAETC~~ / BAE PURCHASE AGREEMENT -  
~~MAGNA~~ LEFT ALL ASSETS, including buildings, furniture.  
~~MAGNA~~ REMOVED ALL H.W. and ALL CONTENTS OF THE FILES INCLUDING PERSONNEL.
- I INFORMED MR. KASPER THAT I WOULD GET BACK TO HIM MIDDLE OF NEXT WEEK PERTAINING TO THE PROPOSED ALTERATION (CURTAINS) TO THE STORAGE BAYS, ONCE PAT PAYNE HAD DISCUSSED THIS WITH SR. CIRIELLO. IN ADDITION TO CLARIFY, ~~ADD THAT THE PLANS HE GAVE ME WOULD~~ THE USE OF DOT REG CONTAINERS.
- I INFORMED HIM OF THE 10 ft. <sup>(CAL OSHA)</sup> RULE ~~CEHA~~ FOR FLAMMABLES. HE REMINDED THAT THE DUMPS ADJACENT TO THE FLAMMABLE BAY ~~WERE~~ <sup>WILL</sup> WERE COMBUSTIBLE NOT FLAMMABLE AND WERE WITHIN CAL OSHA ~~REGS.~~

Firm: CAETCAddress: 1125 HENSLEY STREET  
RICHMOND, CA 94801Tel. No. (415) 233-8001☐ Conclusions☐ Actions taken☐ Actions to be taken

CALL MR. KASPER BACK WITH DECISION

Informational copies PLTPAT PAYNE



Date: 3/12/91

Time: 3:30pm

To: MARK KASPER

From: BONNIE GRIFFITH

RECORD OF  
COMMUNICATION☐ Discussion☐ Field Trip☐ Meeting☒ Phone Call☐ Other

Subject:

LETTERS FOR ADDITION of SCBA'S & HHA's  
Issue

SUMMARY: I returned Mark Kasper's Call of 3/12/91 - I explained to him that I ~~was~~ had been going to call him that afternoon. I told him that it was ~~the consensus of both Permitting~~ <sup>agreed</sup> + Surveillance and enforcement that the addition of the scuba's at the storage bay was not a modification of the permit & they could proceed & I please send a letter as to what they would be doing to Permitting (Sal Ciriello). I also told Mark I sent a letter regarding the change from Scott Air Apparatus (mentioned in the current operation plan) to MSA's in their operation. I also explained to him that HHA has to be in 17 drums as described in the current operation plan and that the partial 1 gallon fiber DOT containers w/ HHA could be a potential violation. Also I stated that the use of initials in the inspection log was also a potential violation. I informed him that I had not yet received the letter with the new emergency coordinators for the facility. He said he would check on this -

Firm: CAETC

Address:

Richmond

Tel. No.

(415) 233-8001

☐ Conclusions☐ Actions taken☒ Actions to be taken

Follow up letter per this conversation to  
Mr Kasper -

Informational copies: PAT PAYNE

Sal Ciriello

—  
—

Date: 3/12/91Time: 12:45 AM.To: Ken McKevenyFrom: Bonnie G. Pittafor Pat PayneRECORD OF  
COMMUNICATION☐ Discussion☐ Field Trip☐ Meeting☐ Phone Call☐ Other

Subject:

Feb 28, 1991 - letter

## SUMMARY:

I called Mr. McKeveny on behalf of Pat Payne. Mr. Keveny works for Jim Bell. His call was in request to a Feb 28, 1991 letter sent to DHS and rec'd by DHS on 3-5-91. The 2 major points of the letter were

- ① Storage of certain chemicals in the already designated bags
- ② The consolidation of household haz waste (-HHW)

His question pertained to ②. Was the consolidation of household hazardous waste part of the permit. I told him it was under the del OP & the authority came from the permit. Therefore it was part of the permit. I also explained to him that HHW packaged on site had to be in 55-gallon drums, even if it was in DOT packages. DOT packages from off site customers were alright. I told him to talk to David TAO or Sal Cirillo - he was not aware ~~that HHW had to be in 55-gallon drums~~ that HHW had to be in 55-gallon drums. I told him I ~~was~~ would be calling AETC to clarify this point.

Firm:

AETC

Address:

New Jersey

Tel. No.

(201) 691-7320☐ Conclusions☐ Actions taken☐ Actions to be taken

Forwarded info to Permitting TAO/Cirillo.

Informational copies:

Pat PayneSal Cirillo / DAVIOTA



DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM  
3 HEINZ AVE., BLDG. F, STE. 200  
BERKELEY, CA 94710

CCPYO

March 21, 1991

Mr. James T. Bell  
Director, Regulatory Affairs  
Advances Environmental Technology Corp.  
Gold Mine Road  
Flander, New Jersey 07836

Dear Mr. Bell:

EPA ID NO. CAT 080 014 079

This is in response to your letters dated February 28, 1991 and March 7, 1991 requesting clarification on several issues regarding your operations at the California Advanced Environmental Technology Corporation (CAETC) in Richmond, California.

CAETC requested specific interpretations from the Department of Health Services (Department) on the following three issues:

- 1) CAETC's compatibility grouping systems for lab packs and placement of these groups into the five existing storage areas.
- 2) Handling of household hazardous waste.
- 3) Handling of small quantity generators waste.

CAETC's evaluation of the compatibility group versus the five designated storage areas is acceptable to the Department.

The consolidation at your Richmond facility of household hazardous waste is acceptable as long as the consolidation is done in the designated storage areas and the household wastes are consolidated into fifty-five (55) gallon DOT approved containers.

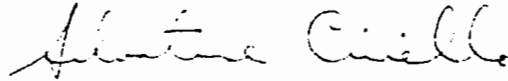
CAETC's proposed program to service the needs of small quantity generators is not acceptable under the terms and conditions of the existing (1983) permit and operation plan. This proposed plan should be addressed in the Revised Part B Application, which must be submitted to the Department within 45 days of date of the Notice of Deficiency letter.

In the future, any further clarification regarding CAETC's existing permit should be addressed to the Facility Permitting Branch (FPB). At a minimum, FPB should be copied on all letters addressed to Surveillance and Enforcement Branch concerning CAETC.

Mr. James T. Bell  
March 21, 1991  
Page 2

If you have any questions, please contact David Tao at (415) 540-3934.

Sincerely,



Salvatore Ciriello  
Unit Chief  
Facility Permitting Branch  
Region 2  
Toxic Substances Control Program

cc: Robert Lowell  
Environmental Manager  
California Advances Environmental Technology Corp.  
Hayward Commerce Center  
19410 Cabot Blvd.  
Hayward, CA 94545

Pat Payne  
SEB/Region 2





GOLD MINE ROAD, FLANDERS, NEW JERSEY 07836 201-347-7111

RECEIVED  
DEPT. OF HEALTH SERVICES  
MAR 21 AM 11:26  
#113  
TSCP/REGION 2

March 20, 1991

Ms. Bonnie C. Griffith  
Associate Hazardous Materials  
Specialist  
Department of Health Services  
Toxic Substances Control Program  
700 Heinz Avenue, Suite 201  
Berkeley, CA 94710

Dear Ms. Griffith:

Reference: Inspection at California Advanced Environmental  
Technology Corporation (CAETC) Richmond, California

The purpose of this letter is to respond to several concerns that were brought to our attention during your inspection on February 28, 1991 and subsequent telephone conversations with Ken McKeveny, of my staff. The following is a detailed response to the four (4) areas of concern.

First, there was a concern over the contingency plan that was on site during your inspection. As you are aware, CAETC is currently operating this facility under the permit that was issued to Bay Area Environmental (BAE) based on an operational plan that was submitted by BAE. Due to the fact that there has been a change in emergency coordinators as well as emergency response procedures, a revised contingency plan has been prepared. A copy of this revised plan was submitted to the California Department of Health Services (CADHS) in January when we submitted our revised operational plan. Enclosed please find a copy of this contingency plan that will be used in case of an emergency at the Richmond facility.

Secondly, it was brought to our attention that the list of emergency equipment provided by BAE included Scott paks. CAETC utilizes MSA breathing equipment rather than Scott paks. This change is also identified on the list of emergency equipment provided in the contingency plan.

ATTACHMENT CC



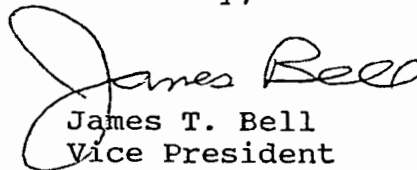
Page 2  
March 19, 1991  
Ms. Bonnie Griffith

Next, CAETC is in the process of obtaining information for installing plastic curtains across the front of the storage bays. The reason for this change is to prevent stormwater from blowing into the storage bays as well as preventing pigeons from entering. This concept is also being discussed with representatives from OSHA. CAETC expects to install these plastic curtains in the near future.

Finally, you addressed a concern over storing household hazardous waste in fiber drums. CAETC understands that the operational plan submitted by BAE stated that all materials will be stored in 55-gallon steel drums. However, this was discussed with representatives of the CADHS and it was determined that any container would be acceptable provided it was a United States Department of Transportation (USDOT) approved container. CAETC will be utilizing 55-gallon steel drums for household hazardous materials that will be consolidated (i.e., paints/oils). However, other materials will be packaged as lab packs in fiber drums and incinerated as hazardous waste. The commercial hazardous waste incinerators accept these materials in fiber drums rather than 55-gallon steel drums.

If you have any questions, please contact me at your convenience at (201) 691-3910.

Sincerely,



James T. Bell  
Vice President  
Technical & Regulatory Affairs

JTB/pas

Enclosure

cc: Sal Ciriello, CADHS  
Don Lees, CAETC